

# **Exhibit L2**

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 -----x  
5 EASTERN PROFIT CORPORATION LIMITED,

6 Plaintiff-Counterclaim Defendant,

7 - against -

8 STRATEGIC VISION US, LLC,

9 Defendant-Counterclaim Plaintiff,

10 - against -

11 GUO WENGUI a/k/a MILES KWOK,

12 Counterclaim Defendant.  
13 -----x

14 340 Madison Avenue  
15 New York, New York

16 January 31, 2019  
17 9:40 a.m.

18 EXAMINATION BEFORE TRIAL of YVETTE  
19 WANG, a 30(b)(6) Witness on behalf of EASTERN  
20 PROFIT CORPORATION LIMITED, the  
21 Plaintiff-Counterclaim Defendant herein, taken  
22 by the Defendant-Counterclaim Plaintiff,  
23 pursuant to Court Order, held at the  
24 above-mentioned time and place, before Michelle  
25 Lemberger, a Notary Public of the State of New  
York.

<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 A P P E A R A N C E S:</p> <p>3</p> <p>4 ZEICHNER ELLMAN &amp; KRAUSE, LLP</p> <p>5 Attorneys for Plaintiff-Counterclaim Defendant</p> <p>6 35 Mason Street</p> <p>7 Greenwich, Connecticut 06830</p> <p>8 BY: ZACHARY GRENDI, ESQ.</p> <p>9</p> <p>10 PHILLIPS LYTLE, LLP</p> <p>11 Attorneys for Defendant-Counterclaim Plaintiff</p> <p>12 340 Madison Avenue, 17th Floor</p> <p>13 New York, New York 10173</p> <p>14 BY: JOSEPH SCHMIT, ESQ.</p> <p>15 jschmit@phillipslytle.com</p> <p>16</p> <p>17 HEATHER KIDERA, ESQ.</p> <p>18</p> <p>19 HODGSON RUSS, LLP</p> <p>20 Attorneys for Counterclaim Defendant</p> <p>21 605 Third Avenue, Suite 2300</p> <p>22 New York, New York 10158</p> <p>23 BY: ERIN N. TESKE, ESQ.</p> <p>24</p> <p>25 ALSO PRESENT:</p> <p>French Wallop</p> <p>Sophia Xie - Mandarin interpreter</p> <p>(sitting in)</p> <p>* * * * *</p>	<p style="text-align: right;">Page 4</p> <p>1</p> <p>2 Y V E T T E W A N G, having been first duly</p> <p>3 sworn by a Notary Public of the State</p> <p>4 of New York, was examined and</p> <p>5 testified as follows:</p> <p>6 BY THE REPORTER:</p> <p>7 Q. Please state your name for the</p> <p>8 record.</p> <p>9 A. Yvette Wang.</p> <p>10 Q. What is your present address?</p> <p>11 A. 150 East 57th Street, Apartment 22D,</p> <p>12 New York, New York 10022.</p> <p>13 EXAMINATION BY</p> <p>14 MR. SCHMIT:</p> <p>15 Q. Good morning. Could you please</p> <p>16 state your name for the record?</p> <p>17 A. Yvette Wang.</p> <p>18 Q. Ms. Wang, my name is Joe Schmit. We</p> <p>19 met a moment ago. I represent defendant and</p> <p>20 counterclaim plaintiff in this, Strategic</p> <p>21 Vision U.S. LLC.</p> <p>22 You're here this morning for your</p> <p>23 deposition. Do you recognize that?</p> <p>24 A. Yes.</p> <p>25 Q. You're here specifically as a</p>
<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 S T I P U L A T I O N S</p> <p>3</p> <p>4 IT IS HEREBY STIPULATED AND AGREED by</p> <p>5 and between the attorneys for the respective</p> <p>6 parties herein, that filing, sealing and</p> <p>7 certification be and the same are hereby</p> <p>8 waived.</p> <p>9 IT IS FURTHER STIPULATED AND AGREED</p> <p>10 that all objections, except as to the form of</p> <p>11 the question shall be reserved to the time of</p> <p>12 the trial.</p> <p>13 IT IS FURTHER STIPULATED AND AGREED</p> <p>14 that the within deposition may be signed and</p> <p>15 sworn to before any officer authorized to</p> <p>16 administer an oath, with the same force and</p> <p>17 effect as if signed and sworn to before the</p> <p>18 Court and that a copy of this examination</p> <p>19 shall be furnished without charge to the</p> <p>20 attorney representing the witness testifying</p> <p>21 herein.</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 Yvette Wang</p> <p>2 30(b)(6) representative for plaintiff in this</p> <p>3 action, Eastern Profit Corporation Limited;</p> <p>4 is that right?</p> <p>5 A. Yes.</p> <p>6 Q. Has your attorney explained to you</p> <p>7 what that means, being a 30(b)(6)</p> <p>8 representative?</p> <p>9 A. Yes.</p> <p>10 Q. I'm going to ask you a series of</p> <p>11 questions. All I ask is that you give me</p> <p>12 complete and truthful answers; is that all</p> <p>13 right?</p> <p>14 A. Will do.</p> <p>15 Q. The most important thing in my book</p> <p>16 is that you understand the question.</p> <p>17 A. Yes.</p> <p>18 Q. If at any time you don't understand</p> <p>19 the question I am asking, just let me know,</p> <p>20 okay?</p> <p>21 A. Yes.</p> <p>22 Q. I will do my best to meet your</p> <p>23 concern. Okay?</p> <p>24 A. Yes, thank you.</p> <p>25 Q. There's one thing. There was a</p>

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6 to 9

<p style="text-align: right;">Page 6</p> <p>1 Yvette Wang</p> <p>2 little bit of a miscommunication. We do have</p> <p>3 a Mandarin interpreter in the room, but my</p> <p>4 understanding is you don't need an</p> <p>5 interpreter?</p> <p>6 A. Thank you.</p> <p>7 Q. Is that correct?</p> <p>8 A. I will try my best, it's correct.</p> <p>9 Q. Okay. If during the morning there</p> <p>10 comes a time, because for whatever set of</p> <p>11 reasons you want to change your mind, just</p> <p>12 let me know. Okay?</p> <p>13 A. Sure, thank you.</p> <p>14 MR. GRENDI: Just before we get</p> <p>15 into it, I just want to put an</p> <p>16 objection on the record. I think</p> <p>17 just for clarity and consistency down</p> <p>18 the road because I don't want to be</p> <p>19 interrupting you all the time, but to</p> <p>20 the extent that you're asking</p> <p>21 questions that are part of the topics</p> <p>22 encompassed in the 30(b)(6)</p> <p>23 attachment, obviously the witness</p> <p>24 will be answering for the</p> <p>25 corporation. To the extent there are</p>	<p style="text-align: right;">Page 8</p> <p>1 Yvette Wang</p> <p>2 what's been marked for your deposition as</p> <p>3 Exhibit 1.</p> <p>4 A. Thank you.</p> <p>5 Q. It is Strategic Vision's notice of</p> <p>6 30(b)(6) deposition to plaintiff.</p> <p>7 Do you have that in front of you?</p> <p>8 A. Yes.</p> <p>9 Q. Have you seen it before?</p> <p>10 A. Yes, I did.</p> <p>11 Q. If you can turn to the last page,</p> <p>12 those are the list of topics that have been</p> <p>13 identified.</p> <p>14 Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. Have you reviewed those topics</p> <p>17 before?</p> <p>18 A. Yes.</p> <p>19 Q. Are there any topics there that</p> <p>20 you're not prepared to testify concerning</p> <p>21 today?</p> <p>22 A. No. All of them, I'm ready to</p> <p>23 answer the question.</p> <p>24 Q. Eastern Profit Corporation Limited,</p> <p>25 are you familiar with that entity?</p>
<p style="text-align: right;">Page 7</p> <p>1 Yvette Wang</p> <p>2 questions being asked outside of</p> <p>3 that, the witness will not be</p> <p>4 answering for the corporation, will</p> <p>5 be answering based on her own</p> <p>6 knowledge. And I may pop in with</p> <p>7 that every now and then.</p> <p>8 BY MR. SCHMIT:</p> <p>9 Q. Ms. Wang, I'm going to ask you from</p> <p>10 time to time how you know the answer and just</p> <p>11 let me know if you've been educated and</p> <p>12 provided the answer or if it is from your</p> <p>13 personal knowledge; is that okay?</p> <p>14 A. Okay.</p> <p>15 MR. SCHMIT: Let's have this</p> <p>16 marked as Exhibit 1. If at any time</p> <p>17 you need a break, just let us know,</p> <p>18 okay.</p> <p>19 THE WITNESS: Sure, thank you.</p> <p>20 (Whereupon, at this time, the</p> <p>21 reporter marked the above-mentioned</p> <p>22 notice of deposition as Wang Exhibit</p> <p>23 1 for identification.)</p> <p>24 BY MR. SCHMIT:</p> <p>25 Q. Ms. Wang, I'm going to hand you</p>	<p style="text-align: right;">Page 9</p> <p>1 Yvette Wang</p> <p>2 A. Not too much.</p> <p>3 Q. To what extent are you familiar with</p> <p>4 that entity?</p> <p>5 A. No.</p> <p>6 Q. You said not too much?</p> <p>7 A. Yes.</p> <p>8 Q. How are you, if at all, affiliated</p> <p>9 with Eastern Profit Corporation Limited?</p> <p>10 A. I was told this is another party,</p> <p>11 but I don't know this company at all before</p> <p>12 this project.</p> <p>13 Q. You referred to you were told this</p> <p>14 is another party. What do you mean by that?</p> <p>15 A. Miles, that is the person who</p> <p>16 involved in this project as well, and he told</p> <p>17 me this is another party of the contract.</p> <p>18 Q. Miles, who are you referring to?</p> <p>19 A. Miles Kwok.</p> <p>20 Q. Is he known by any other names?</p> <p>21 A. Kwok Ho Wan, I think.</p> <p>22 Q. Could you spell that?</p> <p>23 A. K-W-O-K, H-O, W-A-N.</p> <p>24 Q. How about Guo?</p> <p>25 A. Yes.</p>

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10 to 13

<p style="text-align: right;">Page 10</p> <p>1 Yvette Wang</p> <p>2 Q. How do you spell that?</p> <p>3 A. G-U-O.</p> <p>4 Q. And is that his first name often?</p> <p>5 A. Last name, family name.</p> <p>6 Q. So sometimes people refer to him as</p> <p>7 Mr. Guo?</p> <p>8 A. Yes.</p> <p>9 Q. If I say Mr. Guo, you'll know who</p> <p>10 I'm referring to?</p> <p>11 A. Yes.</p> <p>12 Q. If I say Eastern Profit, will you</p> <p>13 know that I'm referring to Eastern Profit</p> <p>14 Corporation Limited?</p> <p>15 A. Yes.</p> <p>16 Q. So is it Mr. Guo who introduced you</p> <p>17 to Eastern Profit?</p> <p>18 A. Yes.</p> <p>19 Q. When did that happen?</p> <p>20 A. In December 2017. No, the contract</p> <p>21 was signed 2018, right before this contract</p> <p>22 was signed.</p> <p>23 Q. I'll represent to you the contract</p> <p>24 was signed on January 6, 2018; does that</p> <p>25 sound about right?</p>	<p style="text-align: right;">Page 12</p> <p>1 Yvette Wang</p> <p>2 Do you recognize that document?</p> <p>3 A. Yes.</p> <p>4 Q. What is it?</p> <p>5 A. It's the contract signed between</p> <p>6 Eastern Profit and Strategic Vision.</p> <p>7 Q. And in your answers up until now,</p> <p>8 you've been saying the other party to the</p> <p>9 contract. You're referring to the contract</p> <p>10 that I just marked as Exhibit 2?</p> <p>11 A. Correct.</p> <p>12 MR. GRENDI: Objection to the</p> <p>13 form.</p> <p>14 You can answer.</p> <p>15 Q. When Mr. Guo introduced you to</p> <p>16 Eastern Profit, did he hand you the contract?</p> <p>17 A. I don't understand what you mean,</p> <p>18 hand me the contract?</p> <p>19 Q. How did he say -- what did he say</p> <p>20 when you first heard the words Eastern Profit</p> <p>21 or first heard of the entity?</p> <p>22 A. I remember that happened before I</p> <p>23 went to Virginia to discuss about this</p> <p>24 contract. By then I was request to negotiate</p> <p>25 this contract. Then I ask who is the client.</p>
<p style="text-align: right;">Page 11</p> <p>1 Yvette Wang</p> <p>2 A. 2018. That's right, December 2017.</p> <p>3 Q. So shortly before January you would</p> <p>4 have been introduced to Eastern Profit?</p> <p>5 A. Yes.</p> <p>6 Q. What did Mr. Guo tell you about</p> <p>7 Eastern Profit when he introduced you to that</p> <p>8 company?</p> <p>9 A. He told me this is another party of</p> <p>10 this contract, and then he gave me the name.</p> <p>11 And that's it.</p> <p>12 Q. When you say "another party of the</p> <p>13 contract," what are you referring to?</p> <p>14 A. Another party. The client of this</p> <p>15 contract.</p> <p>16 MR. SCHMIT: Just so the record</p> <p>17 is clear, could I have this marked as</p> <p>18 Exhibit 2?</p> <p>19 (Whereupon, at this time, the</p> <p>20 reporter marked the above-mentioned</p> <p>21 research agreement as Wang Exhibit 2</p> <p>22 for identification.)</p> <p>23 BY MR. SCHMIT:</p> <p>24 Q. I'm going to hand you what's been</p> <p>25 marked as Exhibit 2.</p>	<p style="text-align: right;">Page 13</p> <p>1 Yvette Wang</p> <p>2 Then I had that, this name.</p> <p>3 Q. So you were negotiating the contract</p> <p>4 on behalf of Mr. Guo initially?</p> <p>5 MR. GRENDI: Objection of the</p> <p>6 form.</p> <p>7 You can answer.</p> <p>8 A. I will listen to my lawyer.</p> <p>9 MR. GRENDI: I said you can</p> <p>10 answer.</p> <p>11 Q. No, no, you can answer. Unless he</p> <p>12 tells you not to answer, you have to answer.</p> <p>13 Objections are just for the record.</p> <p>14 A. Okay. Correct.</p> <p>15 Q. And then at some point Mr. Guo said,</p> <p>16 The actual entity that's going to enter the</p> <p>17 contract is Eastern Profit, right?</p> <p>18 A. Correct.</p> <p>19 Q. So initially, when you were</p> <p>20 negotiating in Virginia, you were speaking on</p> <p>21 behalf of Mr. Guo; is that a fair statement?</p> <p>22 MR. GRENDI: Objection, you can</p> <p>23 answer.</p> <p>24 MS. TESKE: Objection.</p> <p>25 A. Correct.</p>

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14 to 17

<p style="text-align: right;">Page 14</p> <p>1 Yvette Wang</p> <p>2 Q. And then at some point prior to</p> <p>3 execution, he said the party we're going to</p> <p>4 put in the contract is Eastern Profit, right?</p> <p>5 MR. GRENDI: Objection.</p> <p>6 You can answer.</p> <p>7 A. I don't remember that.</p> <p>8 Q. So what did he finally tell you when</p> <p>9 he introduced you to Eastern Profit?</p> <p>10 A. Because I am a project manager. I</p> <p>11 have to have enough information for a</p> <p>12 project. So I request the necessary</p> <p>13 information to finish this contract. Then he</p> <p>14 gave me this name.</p> <p>15 Q. What information did you request of</p> <p>16 Mr. Guo in order to finish this project?</p> <p>17 A. At least who is the client or who is</p> <p>18 the vendor.</p> <p>19 Q. So when you asked him who the client</p> <p>20 or the vendor was, he said Eastern Profit; is</p> <p>21 that fair?</p> <p>22 A. Correct.</p> <p>23 Q. What did he tell you about Eastern</p> <p>24 Profit at that time?</p> <p>25 A. I don't remember.</p>	<p style="text-align: right;">Page 16</p> <p>1 Yvette Wang</p> <p>2 MR. GRENDI: I'll just remind</p> <p>3 everyone of the objection as to the</p> <p>4 topics that the witness has been</p> <p>5 prepared to testify about, and this</p> <p>6 outside the topics. But you can go</p> <p>7 ahead and answer.</p> <p>8 MR. SCHMIT: This is well</p> <p>9 within the topics, but you stated</p> <p>10 your objection.</p> <p>11 Q. What does Eastern Profit do?</p> <p>12 A. I do not know.</p> <p>13 Q. Does Eastern Profit have a board of</p> <p>14 directors?</p> <p>15 A. I don't know.</p> <p>16 Q. Are you employed by Eastern Profit?</p> <p>17 A. No, I'm not.</p> <p>18 Q. Are you an officer or director of</p> <p>19 Eastern Profit?</p> <p>20 A. I am not.</p> <p>21 Q. Have you ever met anybody or spoken</p> <p>22 on the phone with anybody who is employed by</p> <p>23 Eastern Profit?</p> <p>24 A. No, I didn't.</p> <p>25 Q. Have you ever met anybody or spoken</p>
<p style="text-align: right;">Page 15</p> <p>1 Yvette Wang</p> <p>2 Q. Did you ask anything?</p> <p>3 A. No.</p> <p>4 Q. Up until that point, had you ever</p> <p>5 heard of Eastern Profit before?</p> <p>6 A. I don't remember I heard about that.</p> <p>7 Q. Sitting here today, you think that</p> <p>8 may have been the first time you ever heard</p> <p>9 of Eastern Profit?</p> <p>10 A. You mean by then?</p> <p>11 MR. GRENDI: Objection to the</p> <p>12 form.</p> <p>13 You can answer, go ahead.</p> <p>14 A. You mean by this time, December</p> <p>15 2017?</p> <p>16 Q. Yes.</p> <p>17 A. Yes.</p> <p>18 Q. So as far as you can recall, that's</p> <p>19 the first time you ever heard of Eastern</p> <p>20 Profit?</p> <p>21 A. Correct.</p> <p>22 Q. Did Mr. Guo tell you anything about</p> <p>23 Eastern Profit?</p> <p>24 A. I don't remember.</p> <p>25 Q. What does Eastern Profit do?</p>	<p style="text-align: right;">Page 17</p> <p>1 Yvette Wang</p> <p>2 on the phone with anybody that you understood</p> <p>3 to be an officer or director of Eastern</p> <p>4 Profit?</p> <p>5 A. No, I didn't.</p> <p>6 Q. Since you executed the contract on</p> <p>7 behalf of Eastern Profit, has anybody told</p> <p>8 you anything about what Eastern Profit does?</p> <p>9 A. You mean business?</p> <p>10 Q. Anything. However you want to</p> <p>11 characterize it.</p> <p>12 A. If I recall a little bit, I'm not</p> <p>13 sure, Mr. Guo said Eastern Profit is a kind</p> <p>14 of, like, investment company. But I didn't</p> <p>15 ask further what is that.</p> <p>16 Q. Do you know where Eastern Profit is</p> <p>17 based?</p> <p>18 A. Hong Kong.</p> <p>19 Q. Does it have an office there?</p> <p>20 A. I don't know.</p> <p>21 Q. Again, do you know if there are any</p> <p>22 employees in Hong Kong?</p> <p>23 A. Eastern Profit employee?</p> <p>24 Q. Yes.</p> <p>25 A. No, I didn't.</p>

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18 to 21

<p style="text-align: right;">Page 18</p> <p>1 Yvette Wang</p> <p>2 Q. You don't know whether there are or</p> <p>3 aren't?</p> <p>4 A. What is your question, I don't</p> <p>5 understand?</p> <p>6 Q. In Hong Kong, are there any, just to</p> <p>7 be clear, are there any employees of Eastern</p> <p>8 Profit in Hong Kong?</p> <p>9 A. I didn't request, I didn't research.</p> <p>10 Q. When he said it was an investment</p> <p>11 company, did you ask what type of</p> <p>12 investments?</p> <p>13 A. No, I didn't.</p> <p>14 Q. Who are you employed by, Ms. Wang?</p> <p>15 A. Golden Spring New York Limited.</p> <p>16 Q. What is that company?</p> <p>17 A. Family office.</p> <p>18 Q. Family office for who?</p> <p>19 A. For clients.</p> <p>20 Q. I just want to make sure, what's</p> <p>21 your definition of a family office?</p> <p>22 A. Family office, my definition?</p> <p>23 Q. Yes.</p> <p>24 A. Work for projects come from family</p> <p>25 and the family's partner, friends,</p>	<p style="text-align: right;">Page 20</p> <p>1 Yvette Wang</p> <p>2 A. I cannot disclosure that.</p> <p>3 Q. Does Mr. Guo review directions at</p> <p>4 Golden Spring?</p> <p>5 A. Sorry?</p> <p>6 Q. Does Mr. Guo tell you what to do</p> <p>7 when you're working on behalf of Golden</p> <p>8 Spring?</p> <p>9 A. No.</p> <p>10 Q. Who does?</p> <p>11 A. China Golden Spring Group, Hong Kong</p> <p>12 Limited.</p> <p>13 Q. Where are they located?</p> <p>14 A. Hong Kong.</p> <p>15 Q. Who speaks on behalf of that entity?</p> <p>16 MR. GRENDI: Objection, again.</p> <p>17 We're really getting far afield of</p> <p>18 what this deposition is supposed to</p> <p>19 be about.</p> <p>20 MR. SCHMIT: You know, I don't</p> <p>21 think we're getting far afield at</p> <p>22 all. But to be perfectly honest, we</p> <p>23 have a 30(b)(6) witness brought in on</p> <p>24 behalf of the plaintiff in this case</p> <p>25 that apparently doesn't know anything</p>
<p style="text-align: right;">Page 19</p> <p>1 Yvette Wang</p> <p>2 associates.</p> <p>3 Q. When you say "family," who are you</p> <p>4 referring to?</p> <p>5 MR. GRENDI: Objection. Again,</p> <p>6 I just want to restate my earlier</p> <p>7 general objection.</p> <p>8 You can answer.</p> <p>9 MR. SCHMIT: What's your</p> <p>10 earlier general objection?</p> <p>11 MR. GRENDI: Outside the scope</p> <p>12 of the list of items in the</p> <p>13 attachment to 30(b)(6).</p> <p>14 MR. SCHMIT: Golden Spring,</p> <p>15 just so it is clear, verified the</p> <p>16 interrogatories in this case.</p> <p>17 MR. GRENDI: I understand that.</p> <p>18 Q. You can answer.</p> <p>19 MR. GRENDI: You can answer.</p> <p>20 Q. Whose family?</p> <p>21 A. A family come from Mainland of China</p> <p>22 and Hong Kong.</p> <p>23 Q. And what is the name of the family?</p> <p>24 A. I cannot disclosure that.</p> <p>25 Q. Is it Mr. Guo's family?</p>	<p style="text-align: right;">Page 21</p> <p>1 Yvette Wang</p> <p>2 about the plaintiff. And this</p> <p>3 company that I'm asking about now,</p> <p>4 verified as attorney in fact the</p> <p>5 interrogatories on behalf of the</p> <p>6 plaintiff.</p> <p>7 MR. GRENDI: Right. They're</p> <p>8 obviously the attorney in fact</p> <p>9 relationship is disclosed. So that's</p> <p>10 clear. If you want to have a</p> <p>11 discussion, I think, off the record,</p> <p>12 maybe we can discuss the problems</p> <p>13 that you're having here. But I</p> <p>14 really want to get this deposition on</p> <p>15 track as to what this contract was</p> <p>16 about and how it was negotiated.</p> <p>17 MR. SCHMIT: We're getting</p> <p>18 there, we're getting there. We are.</p> <p>19 I just want to make sure we</p> <p>20 understand who all the entities are.</p> <p>21 BY MR. SCHMIT:</p> <p>22 Q. Are there other employees for Golden</p> <p>23 Springs New York LTD in New York?</p> <p>24 A. Sorry, what is your question?</p> <p>25 Q. You work for this entity, Golden</p>

<p style="text-align: right;">Page 22</p> <p>1 Yvette Wang</p> <p>2 Springs, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Are there other employees?</p> <p>5 MR. GRENDI: Objection. You</p> <p>6 can answer.</p> <p>7 A. In New York?</p> <p>8 Q. In New York.</p> <p>9 A. I don't answer this. But because,</p> <p>10 you know, I try to save everyone's time, so,</p> <p>11 yes, they do have employees here.</p> <p>12 Q. Where is it? Is there an office?</p> <p>13 A. Yes.</p> <p>14 Q. Where is the office located?</p> <p>15 A. 800 Fifth Avenue.</p> <p>16 Q. How many employees are there for</p> <p>17 this entity?</p> <p>18 A. 12 now, I think, 12.</p> <p>19 Q. Does Mr. Guo work for this entity?</p> <p>20 A. No.</p> <p>21 Q. Why did Golden Springs verify the</p> <p>22 interrogatories in this case?</p> <p>23 MR. GRENDI: Objection.</p> <p>24 You can answer.</p> <p>25 A. I don't understand your question.</p>	<p style="text-align: right;">Page 24</p> <p>1 Yvette Wang</p> <p>2 president with Golden Spring LTD, right?</p> <p>3 A. You're right.</p> <p>4 Q. Why did you verify the</p> <p>5 interrogatories in this fashion?</p> <p>6 MR. GRENDI: I'm just going to</p> <p>7 object to the form, and -- well,</p> <p>8 if -- go ahead and answer if you can.</p> <p>9 A. Because I was project manager of</p> <p>10 this contract (indicating).</p> <p>11 Q. And does Golden Spring LTD have any</p> <p>12 contractual relationships with Eastern</p> <p>13 Profit?</p> <p>14 A. No.</p> <p>15 MR. GRENDI: Objection. I</p> <p>16 mean, I think that needs to be</p> <p>17 clarified and I think there's a</p> <p>18 document that will clarify that.</p> <p>19 Can we go off the record</p> <p>20 briefly?</p> <p>21 MR. SCHMIT: Yes, sure, why</p> <p>22 not?</p> <p>23 MR. GRENDI: Do you want to</p> <p>24 step outside?</p> <p>25 MR. SCHMIT: You want to talk</p>
<p style="text-align: right;">Page 23</p> <p>1 Yvette Wang</p> <p>2 Q. Why did --</p> <p>3 MR. SCHMIT: Let's have this</p> <p>4 marked as Exhibit 3.</p> <p>5 (Whereupon, at this time, the</p> <p>6 reporter marked the above-mentioned</p> <p>7 responses and objections to</p> <p>8 interrogatories as Wang Exhibit 3 for</p> <p>9 identification.)</p> <p>10 BY MR. SCHMIT:</p> <p>11 Q. I'm handing you what's been marked</p> <p>12 for your deposition as Exhibit 3.</p> <p>13 A. Thank you.</p> <p>14 Q. Do you recognize that document?</p> <p>15 A. Yes.</p> <p>16 Q. Turn to the second to last page. Do</p> <p>17 you see that, the verification?</p> <p>18 A. Yes.</p> <p>19 Q. Is that your signature there?</p> <p>20 A. Yes.</p> <p>21 Q. And it says, Yvette Wang, President,</p> <p>22 do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. And then up above it says Golden</p> <p>25 Spring New York LTD. I assume your title is</p>	<p style="text-align: right;">Page 25</p> <p>1 Yvette Wang</p> <p>2 with me?</p> <p>3 MR. GRENDI: With you, yes.</p> <p>4 (Whereupon, a brief recess was</p> <p>5 taken.)</p> <p>6 MR. GRENDI: Just in the</p> <p>7 interest of clarifying the record, as</p> <p>8 I think there is just an error there,</p> <p>9 there is a relationship between</p> <p>10 Golden Spring and Eastern Profit</p> <p>11 Corporation, there's a limited power</p> <p>12 of attorney. That document, we're</p> <p>13 happy to produce that to clarify this</p> <p>14 issue. But I think the answer that</p> <p>15 there's no relationship between</p> <p>16 Eastern Profit and Golden Spring was,</p> <p>17 obviously, just kind of a mistake</p> <p>18 made by a witness that's not an</p> <p>19 attorney.</p> <p>20 So we will produce that</p> <p>21 document shortly. I don't have it on</p> <p>22 me.</p> <p>23 BY MR. SCHMIT:</p> <p>24 Q. Ms. Wang, have you seen this power</p> <p>25 of attorney document?</p>



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<p style="text-align: right;">Page 26</p> <p>1 Yvette Wang</p> <p>2 A. Yes.</p> <p>3 Q. Do you recall who signed it on</p> <p>4 behalf of Eastern Profit?</p> <p>5 A. I don't remember that. It's a long</p> <p>6 time ago. If you have it -- I don't</p> <p>7 remember.</p> <p>8 MR. GRENDI: I believe the</p> <p>9 document will clarify that.</p> <p>10 MR. SCHMIT: Can you help, for</p> <p>11 the record, and say who executed it?</p> <p>12 MR. GRENDI: I know him as</p> <p>13 Hank. His full name is -- it's in</p> <p>14 the interrogatory responses. Let me</p> <p>15 see, I want to make sure I get it</p> <p>16 right for the record. C-H-U-N-G,</p> <p>17 U-A-N-G, H-A-N. That's my</p> <p>18 recollection.</p> <p>19 BY MR. SCHMIT:</p> <p>20 Q. If you can turn to Exhibit 3, second</p> <p>21 page, do you see the second interrogatory,</p> <p>22 number 2?</p> <p>23 A. Yes.</p> <p>24 Q. It says identify the principals of</p> <p>25 Eastern.</p>	<p style="text-align: right;">Page 28</p> <p>1 Yvette Wang</p> <p>2 A. I didn't ask.</p> <p>3 Q. Did he explain to you what his</p> <p>4 relationship with Eastern Profit was?</p> <p>5 A. He didn't explain.</p> <p>6 Q. Do you have any idea why he would</p> <p>7 execute a power of attorney for Eastern</p> <p>8 Profit?</p> <p>9 A. Because we provide service, Golden</p> <p>10 Spring.</p> <p>11 Q. Service to who?</p> <p>12 A. Service to the client.</p> <p>13 Q. Who is the client?</p> <p>14 A. Eastern Profit.</p> <p>15 Q. Does Eastern Profit provide Golden</p> <p>16 Spring with any compensation?</p> <p>17 A. Not now, not yet.</p> <p>18 Q. When you say "not now," will they at</p> <p>19 some time in the future or have they at some</p> <p>20 time in the past?</p> <p>21 MR. GRENDI: Objection of form.</p> <p>22 You can answer.</p> <p>23 A. No.</p> <p>24 Q. And what did you mean by not now?</p> <p>25 MR. GRENDI: Objection.</p>
<p style="text-align: right;">Page 27</p> <p>1 Yvette Wang</p> <p>2 Do you see that?</p> <p>3 A. Yes.</p> <p>4 Q. And then that's Mr. Han, your</p> <p>5 attorney just spelled into the record, right?</p> <p>6 MR. GRENDI: Objection, but,</p> <p>7 yes, go ahead.</p> <p>8 A. Yes.</p> <p>9 Q. Is that the only principal of</p> <p>10 Eastern that you're aware of?</p> <p>11 A. From here, yes.</p> <p>12 Q. Are you aware of any other</p> <p>13 principals of Eastern Profit?</p> <p>14 A. No.</p> <p>15 Q. Have you ever met Mr. Han?</p> <p>16 A. We met before.</p> <p>17 Q. Where does he reside?</p> <p>18 A. Sorry?</p> <p>19 Q. Where does he live? Where does he</p> <p>20 reside?</p> <p>21 A. I don't know.</p> <p>22 Q. Where did you meet him?</p> <p>23 A. New York.</p> <p>24 Q. Do you know if he resides in the</p> <p>25 States, the United States?</p>	<p style="text-align: right;">Page 29</p> <p>1 Yvette Wang</p> <p>2 You can answer.</p> <p>3 Q. You can answer.</p> <p>4 A. Oh.</p> <p>5 MR. GRENDI: You can answer,</p> <p>6 I'm sorry.</p> <p>7 Q. Yes. He's just making an objection</p> <p>8 for the record. It's for him and I to work</p> <p>9 out later, if necessary.</p> <p>10 A. Okay. Because Golden Spring didn't</p> <p>11 sign any contract with Eastern. So I don't</p> <p>12 know there is any payment or any, like,</p> <p>13 payment, yeah.</p> <p>14 Q. Does Eastern Profit have a bank</p> <p>15 account anywhere?</p> <p>16 A. I don't know.</p> <p>17 Q. Why did Eastern Profit enter into</p> <p>18 this contract?</p> <p>19 A. I don't know.</p> <p>20 Q. But Mr. Guo told you Eastern Profit</p> <p>21 was going to be the client that should be put</p> <p>22 in the contract, right?</p> <p>23 A. Correct. Mr. Guo said he is the</p> <p>24 advisor and consultant to Eastern. So that's</p> <p>25 why he communicated and told me Eastern</p>

<p style="text-align: right;">Page 30</p> <p>1 Yvette Wang</p> <p>2 should be in this contract.</p> <p>3 Q. Did he say what he was advising or</p> <p>4 consulting Eastern Profit on?</p> <p>5 A. He didn't say that clearly, but I</p> <p>6 remember he mentioned about, like, strategy</p> <p>7 or some investments, something like that.</p> <p>8 Q. Tell me, when did he give this</p> <p>9 explanation?</p> <p>10 A. I don't remember that clearly.</p> <p>11 Should be in December or January, right</p> <p>12 before or after this contract signed.</p> <p>13 Q. What was the purpose of the</p> <p>14 contract?</p> <p>15 A. Investigation service.</p> <p>16 Q. Investigation of what?</p> <p>17 A. Information.</p> <p>18 Q. What kind of information?</p> <p>19 A. Let me review the contract again.</p> <p>20 (Witness peruses document.)</p> <p>21 Q. You can't answer that question</p> <p>22 without looking at the contract?</p> <p>23 A. I can.</p> <p>24 Q. I mean, you're welcome to look at</p> <p>25 it, but what was being investigated pursuant</p>	<p style="text-align: right;">Page 32</p> <p>1 Yvette Wang</p> <p>2 Q. You use that term as well, correct?</p> <p>3 A. Yes. That is Strategic Vision</p> <p>4 request me to use.</p> <p>5 Q. What did you understand fish to</p> <p>6 mean?</p> <p>7 A. Target people, human beings.</p> <p>8 Q. But Strategic Vision wasn't</p> <p>9 identifying anybody to be researched, that</p> <p>10 was Eastern Profit, right?</p> <p>11 A. Correct.</p> <p>12 Q. So who was Eastern Profit</p> <p>13 identifying to be researched and why?</p> <p>14 A. Some individual who are highly</p> <p>15 corrupted, Chinese people.</p> <p>16 Q. Corrupted in whose view?</p> <p>17 MR. GRENDI: Objection.</p> <p>18 You can answer.</p> <p>19 A. I don't understand your question.</p> <p>20 Q. What do you mean by corrupted?</p> <p>21 A. Corrupted, they are Chinese high</p> <p>22 level official, or some of them they are high</p> <p>23 level and some of them are official,</p> <p>24 government official, and their family. They</p> <p>25 are suspected to have huge illegal criminal</p>
<p style="text-align: right;">Page 31</p> <p>1 Yvette Wang</p> <p>2 to the contract?</p> <p>3 A. Financial, forensic, historical</p> <p>4 research, current tracking research, social</p> <p>5 media research.</p> <p>6 Q. Of what?</p> <p>7 A. Of what? I don't understand your</p> <p>8 question.</p> <p>9 Q. I mean, those are general areas, but</p> <p>10 what's being researched? Buildings, people,</p> <p>11 plants, animals? What's being researched?</p> <p>12 A. People.</p> <p>13 Q. How were the people identified that</p> <p>14 were going to be researched?</p> <p>15 MR. GRENDI: Objection. I just</p> <p>16 want to hop in here. We may be,</p> <p>17 obviously, designating portions of</p> <p>18 this deposition confidential. I just</p> <p>19 want to put that on the record,</p> <p>20 something I should have said at the</p> <p>21 outset, and obviously applies</p> <p>22 retroactively to the beginning.</p> <p>23 Go ahead and answer.</p> <p>24 A. The people they are Strategic Vision</p> <p>25 called them fish, F-I-S-H.</p>	<p style="text-align: right;">Page 33</p> <p>1 Yvette Wang</p> <p>2 assets in other country, which they steal</p> <p>3 from Chinese government and Chinese people.</p> <p>4 Q. And when you say "other country,"</p> <p>5 what are you referring to?</p> <p>6 A. Other country means outside of the</p> <p>7 Mainland of China.</p> <p>8 Q. And these people, were they -- are</p> <p>9 they members of the Communist party?</p> <p>10 A. Some of them, they are.</p> <p>11 Q. And who identified these people?</p> <p>12 MR. GRENDI: Objection.</p> <p>13 You can answer.</p> <p>14 A. Mr. Guo.</p> <p>15 Q. And from where did Mr. Guo get his</p> <p>16 information?</p> <p>17 A. I don't know.</p> <p>18 Q. You never asked?</p> <p>19 A. No.</p> <p>20 Q. Did he ever say why certain</p> <p>21 individuals were being identified?</p> <p>22 A. I didn't ask. But if you want, you</p> <p>23 can follow his social media. He talks a lot</p> <p>24 in there.</p> <p>25 Q. About what he's doing and why he's</p>

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<p style="text-align: right;">Page 34</p> <p>1 Yvette Wang</p> <p>2 doing it?</p> <p>3 A. Yes.</p> <p>4 Q. What is your understanding, though,</p> <p>5 of what he is doing and why he's researching</p> <p>6 these people?</p> <p>7 MR. GRENDI: Objection.</p> <p>8 You can answer.</p> <p>9 A. I don't understand. What is your</p> <p>10 question?</p> <p>11 Q. Well, what is your understanding?</p> <p>12 A. My understanding?</p> <p>13 Q. Of why he's investigating these</p> <p>14 people.</p> <p>15 A. Oh, okay. He needs the information</p> <p>16 about these people to whistle blow and</p> <p>17 disclosure their crime. So Chinese</p> <p>18 government, and even other countries'</p> <p>19 authorities, they can take action to this</p> <p>20 corrupted criminal, Chinese official.</p> <p>21 Q. So your understanding was the</p> <p>22 research would be reported back to China?</p> <p>23 A. I don't know that.</p> <p>24 Q. How was he going to do what you just</p> <p>25 said?</p>	<p style="text-align: right;">Page 36</p> <p>1 Yvette Wang</p> <p>2 A. No.</p> <p>3 Q. Was anybody else from Golden Springs</p> <p>4 involved in this project?</p> <p>5 MR. GRENDI: Objection. You</p> <p>6 can answer.</p> <p>7 A. No.</p> <p>8 Q. How did Eastern Profit identify</p> <p>9 these individuals?</p> <p>10 A. I don't know.</p> <p>11 Q. You never asked?</p> <p>12 A. No.</p> <p>13 Q. Mr. Guo never said, This is where we</p> <p>14 got this list of corrupt people?</p> <p>15 A. No.</p> <p>16 Q. Is Mr. Guo a member of the Communist</p> <p>17 Party?</p> <p>18 A. No.</p> <p>19 MR. GRENDI: Objection. You</p> <p>20 can answer.</p> <p>21 MS. TESKE: Objection.</p> <p>22 A. No. I'm allowed to answer that.</p> <p>23 Q. Are you a member of the Communist</p> <p>24 Party?</p> <p>25 A. I was before.</p>
<p style="text-align: right;">Page 35</p> <p>1 Yvette Wang</p> <p>2 A. What is your question?</p> <p>3 Q. How was Mr. Guo going to help report</p> <p>4 or whistle blow on these individuals?</p> <p>5 MR. GRENDI: Objection.</p> <p>6 You can answer.</p> <p>7 A. I didn't ask. And I don't know.</p> <p>8 But from what he has done on his media, his</p> <p>9 social media, and he probably, I mean,</p> <p>10 explained to the public, I don't know, this</p> <p>11 is all my guess.</p> <p>12 MS. TESKE: Can I add my</p> <p>13 objection to that question? Thank</p> <p>14 you.</p> <p>15 Q. Who besides you assisted on this</p> <p>16 project for Mr. Guo?</p> <p>17 MS. TESKE: Objection.</p> <p>18 MR. GRENDI: Objection. You</p> <p>19 can answer.</p> <p>20 A. I heard there's a gentleman called</p> <p>21 Mr. Han Lianchao, H-A-N, L-I-A-N-C-H-A-O.</p> <p>22 Q. Did you work with anybody else on</p> <p>23 this project other than Mr. Guo?</p> <p>24 MR. GRENDI: Objection. You</p> <p>25 can answer.</p>	<p style="text-align: right;">Page 37</p> <p>1 Yvette Wang</p> <p>2 Q. When did your affiliation with the</p> <p>3 Communist Party end?</p> <p>4 MR. GRENDI: Objection. You</p> <p>5 can answer.</p> <p>6 A. Five years ago, about. Five or six,</p> <p>7 yes.</p> <p>8 Q. Do you know why Mr. Guo cares if</p> <p>9 these individuals are committing crimes</p> <p>10 against the Chinese government?</p> <p>11 MR. GRENDI: Objection. You</p> <p>12 can answer.</p> <p>13 A. It's a big question, but I love to</p> <p>14 answer. And if you follow all the media,</p> <p>15 including New York Times, Washington Post,</p> <p>16 Wall Street Journal, all of this, big media</p> <p>17 internationally, and his own social media,</p> <p>18 you will have the answer.</p> <p>19 Q. How about you provide me with your</p> <p>20 answer?</p> <p>21 A. Because he spoke out on behalf of a</p> <p>22 Chinese outrage, common people, about the</p> <p>23 corruption of Chinese certain high official.</p> <p>24 There's no rule of law and democracy in</p> <p>25 Mainland of China. And Chinese outrage</p>

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38 to 41

<p style="text-align: right;">Page 38</p> <p>1 Yvette Wang</p> <p>2 people, they deserve, and they urgently,</p> <p>3 hungrily need that.</p> <p>4 So he believed what he has been</p> <p>5 doing until now, since two years ago, is for</p> <p>6 justice and for rule of law, democracy of</p> <p>7 China.</p> <p>8 Q. You keep saying certain high</p> <p>9 official. Is there a particular individual</p> <p>10 you're referring to?</p> <p>11 MR. GRENDI: Objection. I just</p> <p>12 want to again --</p> <p>13 A. I would love to answer.</p> <p>14 Q. You could answer.</p> <p>15 MR. GRENDI: I wasn't going to</p> <p>16 say that you can't. Do we want to</p> <p>17 put the names of individuals that are</p> <p>18 going to be potentially more targets</p> <p>19 of this research contract on the</p> <p>20 record?</p> <p>21 MR. SCHMIT: Well, I just want</p> <p>22 to make sure.</p> <p>23 Q. You're saying one high official, you</p> <p>24 keep saying, in your answer. Are you</p> <p>25 referring -- how about a yes or no? Are you</p>	<p style="text-align: right;">Page 40</p> <p>1 Yvette Wang</p> <p>2 identified to be investigated, right?</p> <p>3 A. Yes.</p> <p>4 MR. GRENDI: Objection. You</p> <p>5 can answer.</p> <p>6 Q. The entity ACA Capital Group</p> <p>7 Limited, are you familiar with that?</p> <p>8 A. I heard this name.</p> <p>9 Q. How did you hear this name?</p> <p>10 A. From this project.</p> <p>11 Q. In what context did the name come</p> <p>12 up?</p> <p>13 A. I don't have that.</p> <p>14 Q. Well, how did you hear about it in</p> <p>15 connection with this project?</p> <p>16 A. After that one million was wired to</p> <p>17 Strategic Vision without contract signed, I</p> <p>18 heard ACA trying to fix this mistake. And</p> <p>19 then this name came to me.</p> <p>20 Q. Prior to them wiring a million</p> <p>21 dollars to Strategic Vision, you had never</p> <p>22 heard of ACA Capital?</p> <p>23 A. No, I didn't.</p> <p>24 Q. Do you know why they wired a million</p> <p>25 dollars to Strategic Vision?</p>
<p style="text-align: right;">Page 39</p> <p>1 Yvette Wang</p> <p>2 referring to a particular individual?</p> <p>3 MR. GRENDI: Objection to the</p> <p>4 form.</p> <p>5 You can answer.</p> <p>6 A. From New York Times and Washington</p> <p>7 Post, Wall Street Journal reported about Mr.</p> <p>8 Guo, I know he whistle blow a lot about</p> <p>9 Chinese vice president, somehow, yes. If you</p> <p>10 read article, you can have answer.</p> <p>11 Q. But is that who you were referring</p> <p>12 to?</p> <p>13 A. I don't understand your question.</p> <p>14 Q. In your answer, you keep saying</p> <p>15 singular, high official.</p> <p>16 A. Singular?</p> <p>17 Q. I just want to make sure.</p> <p>18 A. Maybe my English too broken. I</p> <p>19 didn't say singular. What do you mean</p> <p>20 singular?</p> <p>21 Q. As in one person as opposed to many,</p> <p>22 as opposed to plural?</p> <p>23 A. Many, many, yes.</p> <p>24 Q. So when you say "high official,"</p> <p>25 you're referring to the people being</p>	<p style="text-align: right;">Page 41</p> <p>1 Yvette Wang</p> <p>2 A. I don't know, but with this contract</p> <p>3 that's supposed to be the deposit to this</p> <p>4 contract.</p> <p>5 Q. But why did ACA Capital Limited send</p> <p>6 the money?</p> <p>7 MR. GRENDI: Objection, you can</p> <p>8 answer.</p> <p>9 Q. As opposed to, say, Eastern Profit?</p> <p>10 MR. GRENDI: Objection. You</p> <p>11 can answer.</p> <p>12 MR. SCHMIT: What is the</p> <p>13 objection on that one? I'm being</p> <p>14 pretty liberal about not getting into</p> <p>15 this debate, but there have been a</p> <p>16 lot of objections that are</p> <p>17 questionable, to say the least.</p> <p>18 MR. GRENDI: There is a lack of</p> <p>19 clarity in the form.</p> <p>20 MR. SCHMIT: There is? What is</p> <p>21 it? I'd like to meet it.</p> <p>22 MR. GRENDI: I mean, I think</p> <p>23 you're indicating that -- well, you</p> <p>24 know what --</p> <p>25 MR. SCHMIT: I asked why?</p>

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<p style="text-align: right;">Page 42</p> <p>1 Yvette Wang</p> <p>2 MR. GRENDI: I mean, what, as</p> <p>3 to --</p> <p>4 MR. SCHMIT: It's kind of a</p> <p>5 standard question.</p> <p>6 MR. GRENDI: You want me to</p> <p>7 explain why your question is a little</p> <p>8 bit incomplete? I don't want to --</p> <p>9 MR. SCHMIT: No, if there's a</p> <p>10 form and I can clarify it somehow for</p> <p>11 you or the witness, I'd like to do</p> <p>12 so.</p> <p>13 MR. GRENDI: Well, I'll allow</p> <p>14 it to go forward, but I just think</p> <p>15 it's not necessarily an accurate</p> <p>16 reflection of what's going on here.</p> <p>17 But go ahead.</p> <p>18 MR. SCHMIT: Can you read the</p> <p>19 question for the witness?</p> <p>20 (Whereupon, at this time, the requested</p> <p>21 portion was read by the reporter.)</p> <p>22 A. Why? Right?</p> <p>23 Q. Yes.</p> <p>24 A. From my understanding, that was the</p> <p>25 deposit to this research equipment. Before</p>	<p style="text-align: right;">Page 44</p> <p>1 Yvette Wang</p> <p>2 Q. A loan?</p> <p>3 A. Yes.</p> <p>4 Q. Who told you about this loan?</p> <p>5 A. Both Mr. Guo. And if I remember</p> <p>6 correctly, Mr. Han.</p> <p>7 Q. What is the loan?</p> <p>8 A. I don't know.</p> <p>9 Q. But Eastern Profit had loaned money</p> <p>10 to ACA Capital?</p> <p>11 A. Borrow money from ACA Capital.</p> <p>12 Q. How much did they borrow?</p> <p>13 A. I don't know.</p> <p>14 Q. Was the idea that Eastern Profit was</p> <p>15 going to have to pay this million dollars</p> <p>16 back to ACA Capital?</p> <p>17 A. They called this is a loan,</p> <p>18 officially there should be a payback, in my</p> <p>19 understanding.</p> <p>20 Q. In other words, at some point ACA</p> <p>21 Capital is going to want that million dollars</p> <p>22 back from Eastern Profit?</p> <p>23 A. You are right.</p> <p>24 Q. Why did ACA Capital agree to provide</p> <p>25 the funds to Eastern Profit?</p>
<p style="text-align: right;">Page 43</p> <p>1 Yvette Wang</p> <p>2 the research equipment was officially signed,</p> <p>3 and that was a kind of mistake, shouldn't</p> <p>4 happen. Because there was even not a</p> <p>5 contract at all by then.</p> <p>6 Q. You mean a contract hasn't been</p> <p>7 executed at all by then?</p> <p>8 A. Signed, executed, correct.</p> <p>9 Q. Right. Because the wire from ACA</p> <p>10 Capital came a few days before January 6th,</p> <p>11 right?</p> <p>12 A. January 6th, correct.</p> <p>13 Q. Which is the day the contract was</p> <p>14 actually executed, right?</p> <p>15 A. You are right.</p> <p>16 Q. But I'm going to go back to my</p> <p>17 question.</p> <p>18 Why did ACA Capital Limited send</p> <p>19 money that you're saying is pursuant to a</p> <p>20 contract that ACA Capital Limited never</p> <p>21 signed, ever?</p> <p>22 A. So you are asking why, right?</p> <p>23 Q. Why.</p> <p>24 A. I heard there is a loan between</p> <p>25 Eastern Profit and ACA.</p>	<p style="text-align: right;">Page 45</p> <p>1 Yvette Wang</p> <p>2 A. There was a loan.</p> <p>3 Q. But why did they agree to enter into</p> <p>4 the loan for this contract?</p> <p>5 A. I don't know.</p> <p>6 Q. You don't know why they didn't?</p> <p>7 A. No.</p> <p>8 Q. Is there documentation to support</p> <p>9 this loan?</p> <p>10 A. I requested there should be some</p> <p>11 documents.</p> <p>12 Q. Have you ever seen the documents</p> <p>13 supporting this loan?</p> <p>14 A. I didn't see that.</p> <p>15 Q. You did not see it?</p> <p>16 A. No.</p> <p>17 MR. SCHMIT: Obviously, if</p> <p>18 there's any documents supporting this</p> <p>19 loan, we'd ask that they be produced.</p> <p>20 MR. GRENDI: Request noted.</p> <p>21 Q. What is ACA Capital Limited?</p> <p>22 A. I heard it's a fund management</p> <p>23 company, assets management company, something</p> <p>24 like that.</p> <p>25 Q. Where is it located?</p>

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<p style="text-align: right;">Page 46</p> <p>1 Yvette Wang</p> <p>2 A. I heard it's located in Hong Kong.</p> <p>3 Q. Have you ever spoken with anybody</p> <p>4 from ACA Capital Limited?</p> <p>5 A. No.</p> <p>6 Q. Does Golden Springs do business with</p> <p>7 ACA Capital Limited?</p> <p>8 MR. GRENDI: Objection. You</p> <p>9 can answer.</p> <p>10 A. No.</p> <p>11 Q. Is Mr. Guo affiliated with ACA</p> <p>12 Capital Limited at all?</p> <p>13 A. I don't know.</p> <p>14 Q. Has there been any communications</p> <p>15 with ACA Capital Limited since this lawsuit</p> <p>16 began?</p> <p>17 A. You mean the communication between</p> <p>18 who and who?</p> <p>19 Q. Eastern Profit and ACA Capital</p> <p>20 Limited.</p> <p>21 A. I don't know.</p> <p>22 Q. Nobody has informed you of any?</p> <p>23 A. No.</p> <p>24 Q. You don't know if ACA Capital has</p> <p>25 inquired about where the million dollars is</p>	<p style="text-align: right;">Page 48</p> <p>1 Yvette Wang</p> <p>2 form.</p> <p>3 You can answer.</p> <p>4 A. I don't know.</p> <p>5 Q. Does Golden Springs work for any --</p> <p>6 do any work for any clients unaffiliated with</p> <p>7 Mr. Guo?</p> <p>8 A. I don't understand your question.</p> <p>9 What is your question?</p> <p>10 Q. Are there any clients other than</p> <p>11 companies that Mr. Guo brings to Golden</p> <p>12 Springs that Golden Springs does work for?</p> <p>13 MR. GRENDI: Objection. I just</p> <p>14 want to clarify, which Golden Spring?</p> <p>15 MR. SCHMIT: New York Golden</p> <p>16 Spring, that the witness is an</p> <p>17 employee of.</p> <p>18 A. So you're asking Golden Spring's</p> <p>19 clients?</p> <p>20 Q. Yes.</p> <p>21 A. I cannot disclosure that. But you</p> <p>22 ask, is there any clients of Golden Spring</p> <p>23 who was or were introduced by Mr. Guo?</p> <p>24 Q. No, that were not. I mean, are all</p> <p>25 the clients brought to your Golden Spring by</p>
<p style="text-align: right;">Page 47</p> <p>1 Yvette Wang</p> <p>2 or anything along those lines?</p> <p>3 A. They didn't tell me, but I heard</p> <p>4 from Mr. Guo that there was a loan, and they</p> <p>5 are asking the money back. But, obviously,</p> <p>6 that conversation might happen in Hong Kong,</p> <p>7 which I was not involved.</p> <p>8 Q. But Mr. Guo informed you that they</p> <p>9 are probably asking for the money back?</p> <p>10 A. Correct.</p> <p>11 Q. Do you know what the terms of the</p> <p>12 loan were?</p> <p>13 A. I don't know.</p> <p>14 Q. Are they asking for the money back</p> <p>15 because the term -- the contract was</p> <p>16 terminated?</p> <p>17 A. Obviously --</p> <p>18 MR. GRENDI: Objection of form.</p> <p>19 You can answer.</p> <p>20 A. Obviously, correct. Because this</p> <p>21 contract produced nothing.</p> <p>22 Q. By the way, is that why ACA Capital</p> <p>23 Limited is asking for the money back, do you</p> <p>24 know that?</p> <p>25 MR. GRENDI: Objection to the</p>	<p style="text-align: right;">Page 49</p> <p>1 Yvette Wang</p> <p>2 Mr. Guo?</p> <p>3 A. Oh, is there any --</p> <p>4 MR. GRENDI: Objection.</p> <p>5 A. Is there any other client, right?</p> <p>6 Brought by Mr. Guo to Golden Spring,</p> <p>7 introduced, you mean, right?</p> <p>8 Q. Why don't you answer that question,</p> <p>9 we'll start there.</p> <p>10 MR. GRENDI: Objection.</p> <p>11 Q. Just a yes or no.</p> <p>12 MR. GRENDI: I don't understand</p> <p>13 this question.</p> <p>14 MR. SCHMIT: She's asking me --</p> <p>15 she's got a question in mind. She</p> <p>16 can answer it and we will get beyond</p> <p>17 it.</p> <p>18 A. Sorry, I don't mean to be rude, but</p> <p>19 I need to know the question.</p> <p>20 Q. Okay. Your company, Golden Springs</p> <p>21 does work for clients, right?</p> <p>22 A. Correct.</p> <p>23 Q. You've referred to Golden Springs as</p> <p>24 a family office, correct?</p> <p>25 A. Correct.</p>

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<p style="text-align: right;">Page 50</p> <p>1 Yvette Wang</p> <p>2 Q. Are any of Golden Springs' clients</p> <p>3 from a source other than Mr. Guo?</p> <p>4 MR. GRENDI: Objection. This</p> <p>5 has no relevance to this.</p> <p>6 MR. SCHMIT: It does. They</p> <p>7 signed the interrogatories and we're</p> <p>8 not getting much information on</p> <p>9 anything else. I have to try to work</p> <p>10 through these issues and find out</p> <p>11 what's going on here.</p> <p>12 MR. GRENDI: You're asking</p> <p>13 about clients other than the parties</p> <p>14 that are involved in this action.</p> <p>15 MR. SCHMIT: I haven't asked</p> <p>16 for the identification.</p> <p>17 Q. I want to know, is Golden Springs</p> <p>18 Mr. Guo's family office?</p> <p>19 A. No.</p> <p>20 Q. Then are there other clients for</p> <p>21 Golden Springs that are introduced by</p> <p>22 individuals or come from sources other than</p> <p>23 Mr. Guo?</p> <p>24 A. Yes, we do have.</p> <p>25 Q. Now, the family that you work for is</p>	<p style="text-align: right;">Page 52</p> <p>1 Yvette Wang</p> <p>2 A. I heard this was drafted by</p> <p>3 Strategic Vision.</p> <p>4 Q. Now, you heard that; who did you</p> <p>5 hear that from?</p> <p>6 A. Mr. Guo.</p> <p>7 Q. Did Mr. Guo hand it to you and say,</p> <p>8 This is a draft prepared by Strategic Vision?</p> <p>9 A. Yes.</p> <p>10 Q. What did he say about it, anything</p> <p>11 in particular?</p> <p>12 A. He said he wants me to review and to</p> <p>13 finish this contract.</p> <p>14 Q. And did you do that?</p> <p>15 A. Yes.</p> <p>16 Q. During the review process, did you</p> <p>17 have conversations with Mr. Guo?</p> <p>18 A. I did.</p> <p>19 Q. Generally speaking, what were the</p> <p>20 tenure of these conversations as you drafted</p> <p>21 the -- as you filled in and finished the</p> <p>22 contract?</p> <p>23 A. Sorry, can I ask you, what is your</p> <p>24 question?</p> <p>25 Q. Just tell me about the conversations</p>
<p style="text-align: right;">Page 51</p> <p>1 Yvette Wang</p> <p>2 located in Mainland China?</p> <p>3 A. And Hong Kong.</p> <p>4 Q. And it is a single family?</p> <p>5 A. Not only one family.</p> <p>6 MR. SCHMIT: Can I get this</p> <p>7 marked as Exhibit 4?</p> <p>8 (Whereupon, at this time, the</p> <p>9 reporter marked the above-mentioned</p> <p>10 research agreement as Wang Exhibit 4</p> <p>11 for identification.)</p> <p>12 BY MR. SCHMIT:</p> <p>13 Q. I'm going to hand you what's been</p> <p>14 marked as Exhibit 4. It's entitled research</p> <p>15 agreement, January 1, 2018. And it's Eastern</p> <p>16 1 through Eastern 4.</p> <p>17 Do you have that in front of you?</p> <p>18 A. Yes.</p> <p>19 Q. Have you ever seen this document</p> <p>20 before?</p> <p>21 A. Yes.</p> <p>22 Q. Who produced -- I mean, not --</p> <p>23 Eastern indicates you guys produced it in</p> <p>24 this litigation. But do you know who drafted</p> <p>25 or generated this document?</p>	<p style="text-align: right;">Page 53</p> <p>1 Yvette Wang</p> <p>2 you had with Mr. Guo as you filled in and</p> <p>3 finished the contract.</p> <p>4 A. He asked me to review the contract,</p> <p>5 and he mentioned about, like, the deposit,</p> <p>6 like price and he explained his request to</p> <p>7 me, asking me to check whether that is</p> <p>8 already included in the contract.</p> <p>9 Q. Whether the deposit and price were</p> <p>10 included?</p> <p>11 A. The terms, including the deposit,</p> <p>12 payment, whether they are correct, whether</p> <p>13 they are included in the contract.</p> <p>14 Q. Now, how would you know whether they</p> <p>15 were correct or not? Did he tell you what</p> <p>16 they should be?</p> <p>17 A. Yes.</p> <p>18 Q. And did you conclude they were</p> <p>19 correct or were they included in the</p> <p>20 contract?</p> <p>21 A. I reviewed and something was not the</p> <p>22 same with what he told me. So I explained to</p> <p>23 him and he asked me to finish the review and</p> <p>24 try to revise it.</p> <p>25 Q. And what was that issue?</p>



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54 to 57

<p style="text-align: right;">Page 54</p> <p>1 Yvette Wang</p> <p>2 A. I don't remember that clearly. It's</p> <p>3 about Strategic Vision called a waterline.</p> <p>4 Mr. Guo, he doesn't like that. And in his</p> <p>5 understanding, that should not be a</p> <p>6 waterline, which is defined by Strategic</p> <p>7 Vision.</p> <p>8 Q. And what was your understanding of</p> <p>9 what was meant by waterline?</p> <p>10 A. Strategic Vision, Ms. Wallop told me</p> <p>11 and that is a waterline in the tank which can</p> <p>12 keep the project and team, her team, working</p> <p>13 and produce the reports. By short term,</p> <p>14 waterline means money. And Strategic Vision,</p> <p>15 I mean, Ms. Wallop requested a certain amount</p> <p>16 of money paid, which maintain her team and</p> <p>17 her research.</p> <p>18 But the argument is, Mr. Guo, he</p> <p>19 would like to keep, we call it a la carte.</p> <p>20 Like, I need how many reports, I pay how many</p> <p>21 reports. If I don't need that amount of</p> <p>22 reports, and we should not go the waterline.</p> <p>23 The waterline is a, if I may describe it as a</p> <p>24 lock-in price or lock-in money, which no</p> <p>25 matter how many reports the client request,</p>	<p style="text-align: right;">Page 56</p> <p>1 Yvette Wang</p> <p>2 project. So we spent hours, hours, hours to</p> <p>3 negotiate about this waterline.</p> <p>4 Q. And the negotiations, what did they</p> <p>5 lead to? What was the final agreement in</p> <p>6 your view?</p> <p>7 A. We had, I remember, we had totally</p> <p>8 three meetings. And by the end, compromised.</p> <p>9 Q. How did you compromise? Is it</p> <p>10 reflected in the final agreement?</p> <p>11 A. Correct.</p> <p>12 Q. Why don't you pull out the final</p> <p>13 agreement and show me where that compromise</p> <p>14 is reflected? It's Exhibit 2.</p> <p>15 A. So you want me to explain what is</p> <p>16 compromise?</p> <p>17 Q. Well, I asked you whether the</p> <p>18 compromise -- you said there was a</p> <p>19 compromise. And I asked you if it was in the</p> <p>20 final agreement. I believe you said yes?</p> <p>21 A. Yes, I said that.</p> <p>22 Q. Now you've got the final agreement</p> <p>23 in front of you and I would like you to point</p> <p>24 out where it is reflected.</p> <p>25 (Witness peruses document.)</p>
<p style="text-align: right;">Page 55</p> <p>1 Yvette Wang</p> <p>2 and we have to pay that, which in Mr. Guo,</p> <p>3 his understanding, is not fair and not</p> <p>4 practical.</p> <p>5 Q. Now, the waterline, is this a</p> <p>6 reference -- does this have anything to do</p> <p>7 with the million dollar deposit?</p> <p>8 A. No. One million dollar deposit has</p> <p>9 nothing to do with waterline. Waterline is</p> <p>10 Ms. Wallop and Strategic Vision requested the</p> <p>11 client of this contract to pay \$750,000 per</p> <p>12 month, no matter how many reports the client</p> <p>13 requested or Strategic Vision provided. That</p> <p>14 money must be paid.</p> <p>15 And the explanation and the reason</p> <p>16 Ms. Wallop explained to me many, many times,</p> <p>17 hours, said that waterline permit her to keep</p> <p>18 her team in our country or other district to</p> <p>19 investigate. And that is her common</p> <p>20 standard, in her business, and in her called</p> <p>21 this, industry, which in my understanding is</p> <p>22 her investigation industry and the business.</p> <p>23 And she repeatedly told me that is</p> <p>24 already very nice and reasonable waterline to</p> <p>25 Miles Guo, and that is mandatory to this</p>	<p style="text-align: right;">Page 57</p> <p>1 Yvette Wang</p> <p>2 A. Yes, it's on page 4. If you see</p> <p>3 second paragraph, it is agreed by both</p> <p>4 parties that for the first three months of</p> <p>5 this agreement, January, February and March</p> <p>6 2018, that the payment of 750,000 U.S.</p> <p>7 dollars will be wired per our instruction to</p> <p>8 our U.S. bank account. And after that there</p> <p>9 is a recap term. What is the recap? Oh,</p> <p>10 yes. It is also agreed by both parties that</p> <p>11 after the March reports and the payments are</p> <p>12 made, that all involved parties will meet to</p> <p>13 recap the accounting.</p> <p>14 Q. What does that mean in your view?</p> <p>15 What is your understanding of that term?</p> <p>16 A. That means in the very beginning,</p> <p>17 Strategic Vision, I mean, Mrs. Wallop</p> <p>18 requested \$750,000 per month for 12 months.</p> <p>19 And, obviously, the client, I mean, Mr. Guo,</p> <p>20 they don't like that, and they didn't agree.</p> <p>21 Q. They did or did not agree?</p> <p>22 A. They did not. So the compromise</p> <p>23 here is that recap. Finally, Mrs. Wallop</p> <p>24 advised or stressed it for the first three</p> <p>25 months, please pay 750,000 per month. And</p>



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<p style="text-align: right;">Page 58</p> <p>1 Yvette Wang</p> <p>2 after the first three months, by the end of</p> <p>3 March, let's recap. See, so you guys still</p> <p>4 pay me 750,000 or there's a lower or higher,</p> <p>5 she called, waterline.</p> <p>6 Q. So the agreement for the first three</p> <p>7 months it was going to be 750,000 for</p> <p>8 January, 750,000 for February and 750,000 for</p> <p>9 March, right?</p> <p>10 A. Correct.</p> <p>11 MR. GRENDI: Objection. You</p> <p>12 can answer.</p> <p>13 A. Waterline.</p> <p>14 Q. Were those amounts ever paid?</p> <p>15 A. No.</p> <p>16 Q. That was 750,000 per month, not</p> <p>17 total, right?</p> <p>18 A. Correct.</p> <p>19 Q. How about the -- what is your</p> <p>20 understanding of the fourth paragraph down?</p> <p>21 The pricing for 30-year units or deliverables</p> <p>22 per year remains a constant \$9 million per</p> <p>23 year or 750,000 per month for 12 months?</p> <p>24 A. You are pointing the correct point.</p> <p>25 This is Mrs. Wallop called waterline, which</p>	<p style="text-align: right;">Page 60</p> <p>1 Yvette Wang</p> <p>2 number Eastern 9, that is your signature</p> <p>3 there, right, on the right-hand side?</p> <p>4 A. Correct.</p> <p>5 Q. So that was one issue, the waterline</p> <p>6 we will call it, that Mr. Guo raised with</p> <p>7 you.</p> <p>8 Did he raise any other issues when</p> <p>9 he saw the draft or the incomplete draft?</p> <p>10 A. She asked me to check about the</p> <p>11 deliverable of reports. In my understanding,</p> <p>12 when she asked me to check, he was already</p> <p>13 told by Strategic Vision, I mean Mrs. Wallop,</p> <p>14 how many reports, how frequency the reports</p> <p>15 will be provided.</p> <p>16 So Mr. Guo asked me, because he</p> <p>17 doesn't read English at all. So he ask me to</p> <p>18 check whether that reports deliverable</p> <p>19 schedule is included in here as his</p> <p>20 understanding.</p> <p>21 Q. Was it?</p> <p>22 A. Yes. Close, almost.</p> <p>23 Q. Did you make or request any changes</p> <p>24 based on what Mr. Guo said?</p> <p>25 A. I didn't.</p>
<p style="text-align: right;">Page 59</p> <p>1 Yvette Wang</p> <p>2 she is able to maintain her investigation</p> <p>3 team waterlined. And she said that is</p> <p>4 mandatory. That is if you want this project,</p> <p>5 you have to pay minimum to keep waterline.</p> <p>6 Q. In other words, that in part</p> <p>7 encompassed what it was going to cost</p> <p>8 Strategic Vision to keep teams out in the</p> <p>9 field and available in order to do the work</p> <p>10 for Eastern Profit, right?</p> <p>11 A. Based on her explanation, she said,</p> <p>12 yes, that is professional and that is a</p> <p>13 mandatory request.</p> <p>14 Q. And that ended up in the final</p> <p>15 contract?</p> <p>16 A. Correct.</p> <p>17 Q. Whose initials are on the bottom</p> <p>18 right corner of Exhibit 2? There seem to be</p> <p>19 initials on each page. Whose are those?</p> <p>20 A. That is mine.</p> <p>21 Q. So is F.C.W., Ms. Wallop's?</p> <p>22 A. Yes.</p> <p>23 Q. And then the other initial is yours?</p> <p>24 A. Correct.</p> <p>25 Q. And then on page 5, production</p>	<p style="text-align: right;">Page 61</p> <p>1 Yvette Wang</p> <p>2 Q. Was a translation of this document</p> <p>3 ever provided to Mr. Guo?</p> <p>4 A. I orally translated for him.</p> <p>5 Q. And he speaks Mandarin?</p> <p>6 A. Correct.</p> <p>7 Q. So you read line by line and got his</p> <p>8 okay to the final agreement, right?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. What other issues? There is</p> <p>11 deliverables, waterline; any other issues</p> <p>12 that Mr. Guo raised with you?</p> <p>13 MR. GRENDI: Objection of form.</p> <p>14 You can answer.</p> <p>15 A. No. That is the main two parts.</p> <p>16 Yes.</p> <p>17 Q. What about the deposit? Did he</p> <p>18 raise any issues with respect to the deposit?</p> <p>19 A. Oh, you reminded me. Because I</p> <p>20 remember clearly when I went through this</p> <p>21 draft with Mr. Guo, I pointed out, I said</p> <p>22 that one million deposit in advance is a lot.</p> <p>23 Because I am a project manager, so I feel I</p> <p>24 should remind him, this is a huge amount of</p> <p>25 money to pay as a deposit.</p>

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<p style="text-align: right;">Page 62</p> <p>1 Yvette Wang</p> <p>2 And I remember Mr. Guo said,</p> <p>3 Mrs. Wallop and Mike, they are respectful</p> <p>4 people. And I trust them. They are</p> <p>5 reliable. And before they even ask three</p> <p>6 million as a deposit in this contract, now</p> <p>7 they reduced by one million, and let's just</p> <p>8 keep that. I remember that conversation.</p> <p>9 Q. So ultimately you agreed to the</p> <p>10 million dollar deposit, correct?</p> <p>11 A. That's right. As a project manager,</p> <p>12 you know, I pointed out my concern, if he</p> <p>13 insisted then I just let it go.</p> <p>14 Q. Did you guys ever discuss any</p> <p>15 mechanism by which you might be able to get</p> <p>16 that million dollar deposit back if something</p> <p>17 wasn't done or things didn't work out under</p> <p>18 the contract?</p> <p>19 A. You mean when I was discussing with</p> <p>20 Mr. Guo?</p> <p>21 Q. Or that you heard of or had been</p> <p>22 educated about.</p> <p>23 A. No, I don't remember that clearly.</p> <p>24 Q. Do you remember it at all?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 64</p> <p>1 Yvette Wang</p> <p>2 Q. Did you ever discuss it with Mr.</p> <p>3 Guo?</p> <p>4 A. About what?</p> <p>5 Q. The deposit being made.</p> <p>6 A. Oh, Mr. Guo send me the receipt, the</p> <p>7 wire transfer receipt. And then told me to</p> <p>8 send a text message to Mrs. Wallop about this</p> <p>9 one million deposit paid.</p> <p>10 Q. And what did -- what was your</p> <p>11 reaction to getting this receipt, this one</p> <p>12 million dollar receipt?</p> <p>13 A. I was shocked.</p> <p>14 Q. Why were you shocked?</p> <p>15 A. Because there was even no contract</p> <p>16 executed and signed. And the money was</p> <p>17 already paid. And in my understanding, this</p> <p>18 is a huge, huge, mistake. Accident.</p> <p>19 Q. So who did you talk to about that?</p> <p>20 A. I texted Mrs. Wallop.</p> <p>21 Q. And what did you tell Mrs. Wallop?</p> <p>22 A. If you have my Signal message with</p> <p>23 her, I remember I texted her. I said, This</p> <p>24 deposit was already wired to you, even</p> <p>25 without the contract signed. And kind of</p>
<p style="text-align: right;">Page 63</p> <p>1 Yvette Wang</p> <p>2 Q. Now, ultimately, you're saying ACA</p> <p>3 Capital Limited made the million dollar</p> <p>4 deposit?</p> <p>5 A. Correct.</p> <p>6 MR. GRENDI: Objection of form.</p> <p>7 You can answer.</p> <p>8 Q. On whose orders did they do that?</p> <p>9 A. I'm sorry, what is your question?</p> <p>10 Q. On whose orders did they do that?</p> <p>11 Why did they do that?</p> <p>12 A. I was not involved in that</p> <p>13 instruction communication. But I guess it's</p> <p>14 only my guess, between Eastern and ACA.</p> <p>15 Q. Eastern and who?</p> <p>16 A. ACA Capital.</p> <p>17 Q. Who on behalf of Eastern would</p> <p>18 have --</p> <p>19 MS. TESKE: Objection.</p> <p>20 A. Obviously, Mr. Han, from the paper.</p> <p>21 Q. Do you know that or have you seen</p> <p>22 anything that would suggest he gave the order</p> <p>23 to wire the million dollar deposit?</p> <p>24 A. No. I was not involved in that</p> <p>25 process.</p>	<p style="text-align: right;">Page 65</p> <p>1 Yvette Wang</p> <p>2 like shows the seriousness. And if you would</p> <p>3 like to continue to do this project, and we</p> <p>4 will stay -- we will stay with our terms</p> <p>5 which is our negotiation. I was very insist,</p> <p>6 if you do not agree, kindly, please, return</p> <p>7 the one million deposit back, and sorry for</p> <p>8 the inconvenience. You have my Signal</p> <p>9 message. I remember that.</p> <p>10 Q. And when you say the contract as</p> <p>11 agreed, in other words, no more changes to</p> <p>12 the contract, we need to sign it as is; is</p> <p>13 that fair?</p> <p>14 A. Correct. Sign my version.</p> <p>15 Q. Okay. And, ultimately, when you say</p> <p>16 your version, the one that was existing at</p> <p>17 the time the million dollars was paid, right?</p> <p>18 A. Correct.</p> <p>19 Q. Were any changes requested or made</p> <p>20 to that contract?</p> <p>21 MR. GRENDI: Objection. You</p> <p>22 can answer.</p> <p>23 A. You mean when?</p> <p>24 Q. After the million dollars showed up,</p> <p>25 did Ms. Wallop or anybody else on behalf of</p>

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<p style="text-align: right;">Page 66</p> <p>1 Yvette Wang</p> <p>2 Strategic Vision request any changes?</p> <p>3 MR. GRENDI: Objection. You</p> <p>4 can answer.</p> <p>5 A. They obviously requested and they</p> <p>6 did, because the version by that wire</p> <p>7 transfer was made, my version was different</p> <p>8 from the final version. This is from</p> <p>9 Mrs. Wallop, this version (indicating).</p> <p>10 There was -- there is some difference in</p> <p>11 there still.</p> <p>12 Q. So changes made after the wire was</p> <p>13 received?</p> <p>14 A. Correct.</p> <p>15 Q. What changes were those?</p> <p>16 A. That first three months waterline</p> <p>17 must be paid after that recap. That is the</p> <p>18 main change.</p> <p>19 Q. That's a change you requested,</p> <p>20 though, right?</p> <p>21 A. No. That was not a change I</p> <p>22 requested. Before that, I request a la</p> <p>23 carte. Like how many reports, the client</p> <p>24 buy, pay how much. There's no waterline.</p> <p>25 Q. When did you have that conversation</p>	<p style="text-align: right;">Page 68</p> <p>1 Yvette Wang</p> <p>2 with her directly.</p> <p>3 Q. And Ms. Wallop said from the</p> <p>4 beginning that with respect -- there has to</p> <p>5 be this waterline concept?</p> <p>6 A. Correct.</p> <p>7 Q. And you conveyed that to Mr. Guo?</p> <p>8 A. I post a request and message to Mr.</p> <p>9 Guo. I told him this is what they call</p> <p>10 waterline, they must have.</p> <p>11 Q. And when would you have given that</p> <p>12 message to Mr. Guo?</p> <p>13 A. You mean when, right?</p> <p>14 Q. When, yes.</p> <p>15 A. From my first meeting with</p> <p>16 Mr. Wallop about this project.</p> <p>17 Q. About when was that?</p> <p>18 A. Sorry, what is the question?</p> <p>19 Q. About when was that?</p> <p>20 A. What time, right?</p> <p>21 Q. Yes.</p> <p>22 A. By the very end of December 2017. I</p> <p>23 don't remember that date.</p> <p>24 Q. So it was December 2017 Ms. Wallop</p> <p>25 by then had said, Look, there has to be a</p>
<p style="text-align: right;">Page 67</p> <p>1 Yvette Wang</p> <p>2 with Ms. Wallop?</p> <p>3 A. The date is -- contract was signed</p> <p>4 January 6th; that is one week before that</p> <p>5 date. It's very end of December, beginning</p> <p>6 of January.</p> <p>7 Q. Any other changes?</p> <p>8 A. No. Mainly that is the most heavily</p> <p>9 biggest argument.</p> <p>10 Q. Had Ms. Wallop told you that's how</p> <p>11 it had to be prior to the wire being</p> <p>12 received?</p> <p>13 MR. GRENDI: Objection. You</p> <p>14 can answer.</p> <p>15 A. Sorry, what is your question?</p> <p>16 Q. Did this waterline concept, you had</p> <p>17 discussed it with Ms. Wallop prior to the</p> <p>18 wire being received or is this a conversation</p> <p>19 you guys had after ACA Capital sent the</p> <p>20 money?</p> <p>21 A. Oh, the waterline conversation</p> <p>22 happened from the first second, from the very</p> <p>23 beginning. And let me make it precise. Even</p> <p>24 before the one million wired, I mean, from</p> <p>25 the very beginning, when I was discussing</p>	<p style="text-align: right;">Page 69</p> <p>1 Yvette Wang</p> <p>2 waterline. And you told Mr. Guo this is the</p> <p>3 position Strategic Vision is taking; is that</p> <p>4 fair?</p> <p>5 A. That is fair. I remember my first</p> <p>6 meeting with Ms. Wallop about this project</p> <p>7 was in the very end of December, in</p> <p>8 Mrs. Wallop's house in Virginia. That was</p> <p>9 our first meeting. And the waterline problem</p> <p>10 happened from that moment.</p> <p>11 Q. When did you see this final version</p> <p>12 of the draft, the final agreement for</p> <p>13 execution?</p> <p>14 A. The final version of this contract,</p> <p>15 the first time I saw was on January 6th, the</p> <p>16 date which was -- this was signed.</p> <p>17 Q. What was your reaction to it? Who</p> <p>18 was at that meeting? Was anybody present?</p> <p>19 A. Only Mrs. Wallop and me.</p> <p>20 Q. Where did that take place?</p> <p>21 A. Ms. Wallop's house, in Virginia</p> <p>22 home.</p> <p>23 Q. And what did you tell Ms. Wallop</p> <p>24 after you looked at the contract?</p> <p>25 A. I remember I went through the</p>

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<p style="text-align: right;">Page 70</p> <p>1 Yvette Wang</p> <p>2 contract. Then I saw that recap after first</p> <p>3 three months.</p> <p>4 Q. And the recap was part of what you</p> <p>5 had requested, right?</p> <p>6 A. No.</p> <p>7 Q. Not at all?</p> <p>8 A. Not as -- that is not my request at</p> <p>9 all. That is Ms. Wallop. She stressed it,</p> <p>10 and she put in the draft. And in my</p> <p>11 understanding, that was a compromise. Like,</p> <p>12 okay, now, let's recap by the end of three</p> <p>13 months about the waterline. At least give a</p> <p>14 chance to recap, instead of request you must</p> <p>15 pay for all the 12 months, right? To me,</p> <p>16 that is a little bit better. So I feel that</p> <p>17 is a compromise.</p> <p>18 Q. Before signing it, did you pick up</p> <p>19 the phone and call anybody?</p> <p>20 A. I called Mr. Guo.</p> <p>21 Q. What did you tell Mr. Guo about that</p> <p>22 agreement?</p> <p>23 A. I told him, I said, This is still</p> <p>24 not my contract. Not my version. And I</p> <p>25 translated to him briefly about the recap,</p>	<p style="text-align: right;">Page 72</p> <p>1 Yvette Wang</p> <p>2 A. Yes.</p> <p>3 Q. What did he say in regards to the</p> <p>4 reports?</p> <p>5 A. You mean --</p> <p>6 Q. The language, when you told him over</p> <p>7 the phone, Remember, look, these are the</p> <p>8 reports, this is when it is going to come in,</p> <p>9 what was his reaction?</p> <p>10 A. You mean by 1/6?</p> <p>11 Q. Yes. As I understand you're having</p> <p>12 a telephone conversation with him on January</p> <p>13 6th?</p> <p>14 A. You're right.</p> <p>15 Q. What did he say about the reports?</p> <p>16 A. He said confirmed, okay.</p> <p>17 Q. The word "report" appears several</p> <p>18 times in the agreement. What is your</p> <p>19 understanding of the word report?</p> <p>20 A. You mean my understanding, personal?</p> <p>21 Q. Well, why don't we start with yours</p> <p>22 and if you have reason to think it's</p> <p>23 different than Eastern, you can let me know.</p> <p>24 A. In my understanding, the report, as</p> <p>25 the, I mean, project manager, if I may call</p>
<p style="text-align: right;">Page 71</p> <p>1 Yvette Wang</p> <p>2 that part.</p> <p>3 Q. And what did he say?</p> <p>4 A. He said, you just go ahead to sign</p> <p>5 it. And we need this project started.</p> <p>6 Q. Are there any other provisions you</p> <p>7 went over with Mr. Guo on the phone?</p> <p>8 A. I emphasized again to him about the</p> <p>9 report delivery schedule, which is weekly</p> <p>10 report in the first month, and then there</p> <p>11 should be a preliminary report for the first</p> <p>12 month, and then after first month, there</p> <p>13 should be at least a monthly report every</p> <p>14 month. And some of the research, the reports</p> <p>15 will be based on the request from the client.</p> <p>16 So that's the two main point I emphasized</p> <p>17 again to him.</p> <p>18 Q. Why did you emphasize the report</p> <p>19 issue to Mr. Guo?</p> <p>20 A. Because that was in the first</p> <p>21 discussion when I saw this project with Mr.</p> <p>22 Guo. And -- yeah, that's the two points he</p> <p>23 really cares about.</p> <p>24 Q. The report and what it was going to</p> <p>25 cost?</p>	<p style="text-align: right;">Page 73</p> <p>1 Yvette Wang</p> <p>2 myself, a little bit, and the report should</p> <p>3 be in black and white. It's solid, reliable,</p> <p>4 and there is value. And I mean, valuable</p> <p>5 information in the deliverable, which we call</p> <p>6 the report, and which should be delivered</p> <p>7 without delay based on the report deliverable</p> <p>8 schedule of this contract signed to the</p> <p>9 client. I mean, as a project manager, that</p> <p>10 is my understanding. First the quality,</p> <p>11 second the timeline.</p> <p>12 Quality means you cannot deliver</p> <p>13 garbage or advertisement or Wikipedia or even</p> <p>14 Russian language stuff. Because that is not</p> <p>15 valuable and they are garbage, nonsense.</p> <p>16 Second, timeline. And you should</p> <p>17 deliver the report based on the contract</p> <p>18 signed in here, which agreed by both sides.</p> <p>19 That is the weekly report, for the first</p> <p>20 month, and monthly report for the following</p> <p>21 month, which never happened.</p> <p>22 Q. What is a progress report, if you</p> <p>23 look on page 2? What is a progress report?</p> <p>24 A. Which paragraph are you referring</p> <p>25 to?</p>

<p style="text-align: right;">Page 74</p> <p>1 Yvette Wang</p> <p>2 Q. The contractor will produce a</p> <p>3 progress report. What is -- compared to a</p> <p>4 general report, what is a progress report?</p> <p>5 (Witness peruses document.)</p> <p>6 A. Progress reports includes, in my</p> <p>7 understanding, again, as a project manager,</p> <p>8 first that should include what is happening.</p> <p>9 What is the team. What is your mechanism.</p> <p>10 And the second mainly that is, I mean, the</p> <p>11 first part should be like 30 percent or 20</p> <p>12 percent of the whole progress report. And</p> <p>13 the rest of the 80 or 70 percent of progress</p> <p>14 report, that should be valuable. Valuable</p> <p>15 means that, okay, there are information in</p> <p>16 there, valuable, instead of having zero</p> <p>17 valuable information and only garbage.</p> <p>18 Q. Well, what's a preliminary report as</p> <p>19 opposed to an overall report, a progress</p> <p>20 report?</p> <p>21 A. The preliminary report, in the first</p> <p>22 month, in my understanding, that should be a</p> <p>23 conclusion report or January, big report for</p> <p>24 the first month. Why the first month need</p> <p>25 preliminary report, because that was the</p>	<p style="text-align: right;">Page 76</p> <p>1 Yvette Wang</p> <p>2 A. Correct. I am sorry about that.</p> <p>3 Q. That's all right.</p> <p>4 A. So comprehensive, within three</p> <p>5 months, which is a bigger report than the</p> <p>6 report of first month and the second month</p> <p>7 and third month. That should be a kind of</p> <p>8 like all together, like summarize. And then</p> <p>9 they have all the information, I mean,</p> <p>10 valuable information in there. They have</p> <p>11 their whole team reported in here. And then</p> <p>12 they may decide, because there is a recap,</p> <p>13 they may decide by the end of third month,</p> <p>14 how they will proceed for the next three</p> <p>15 quarter of that year, that is my</p> <p>16 understanding.</p> <p>17 Q. When you say this is your</p> <p>18 understanding as a project manager, how did</p> <p>19 you gain this understanding of these terms?</p> <p>20 A. How did I get this?</p> <p>21 Q. Yes.</p> <p>22 A. From my work experience.</p> <p>23 Q. And what kind of work experience was</p> <p>24 that and for who?</p> <p>25 A. For who or from who?</p>
<p style="text-align: right;">Page 75</p> <p>1 Yvette Wang</p> <p>2 beginning of this project.</p> <p>3 So you may include who is your team,</p> <p>4 who is your team member, who is your project</p> <p>5 manager, what is your strategy or what is</p> <p>6 your mechanism or working. That's why that</p> <p>7 happened in the first month.</p> <p>8 Why there is no preliminary report</p> <p>9 in the second and third month, the reason is</p> <p>10 the first month needs all of that</p> <p>11 information. Not only the valuable</p> <p>12 information which they worked, but also their</p> <p>13 general and detailed information of their</p> <p>14 investigation team, their work mechanism, at</p> <p>15 least who is the project manager or how they</p> <p>16 work. Fair enough?</p> <p>17 Q. What about comprehensive historical</p> <p>18 research report? Does that differ any from</p> <p>19 kind of this overall report concept or</p> <p>20 progress report or preliminary report?</p> <p>21 A. Comprehensive historical research</p> <p>22 report within three months, in my</p> <p>23 understanding --</p> <p>24 Q. This is your understanding as a</p> <p>25 project manager?</p>	<p style="text-align: right;">Page 77</p> <p>1 Yvette Wang</p> <p>2 Q. However -- your work experience.</p> <p>3 You said you gained this from your work</p> <p>4 experience. Have you done investigative</p> <p>5 contracts before?</p> <p>6 A. Oh, that is better understanding for</p> <p>7 me.</p> <p>8 I'm a project manager and I work for</p> <p>9 many different projects. I don't mean</p> <p>10 investigation project. For example, I build</p> <p>11 house, right? I'm managing like the media</p> <p>12 project. This is a common knowledge and</p> <p>13 common sense as a project manager.</p> <p>14 Q. Well, putting aside -- have you ever</p> <p>15 been a project manager on a, you know,</p> <p>16 confidential research of individuals?</p> <p>17 A. Sorry, can you repeat your question?</p> <p>18 Q. Have you ever been a project manager</p> <p>19 for any contract remotely close to the one we</p> <p>20 have marked as Exhibit 2?</p> <p>21 MR. GRENDI: Objection. You</p> <p>22 can answer.</p> <p>23 A. I believe this is new to me. So</p> <p>24 that's why I was educated, educated by</p> <p>25 Strategic Vision and Ms. Wallop, saying,</p>

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<p style="text-align: right;">Page 78</p> <p>1 Yvette Wang</p> <p>2 Yvette, you are new to this kind of industry,</p> <p>3 I remember that clearly, and she said, we</p> <p>4 never communicate by e-mail and all the</p> <p>5 reports and deliverable we must hand over</p> <p>6 face to face. No e-mail, no phone call.</p> <p>7 That's why, for example, like your</p> <p>8 project, Mike, another associate of Ms.</p> <p>9 Wallop, will fly himself to other country,</p> <p>10 including Swiss, Switzerland, or other</p> <p>11 countries in Asia, to face to face meet their</p> <p>12 project manager and engineer, to receive</p> <p>13 their deliverable.</p> <p>14 So I'm talking about my experience</p> <p>15 to be educated by a professional people in</p> <p>16 this so-called industry. So to answer your</p> <p>17 question as this kind of project to me is new</p> <p>18 and fresh, and I was educated a lot.</p> <p>19 Q. Did you discuss with either Mr. Guo</p> <p>20 or Mr. Han what they expected the reports to</p> <p>21 be prior to execution?</p> <p>22 A. They expected the reports or</p> <p>23 information are valuable.</p> <p>24 Q. But did they talk in terms of the</p> <p>25 form and how they would be delivered,</p>	<p style="text-align: right;">Page 80</p> <p>1 Yvette Wang</p> <p>2 the definition of the report in the</p> <p>3 agreement. Did Ms. Wallop ever suggest she</p> <p>4 was going to write a written report out in</p> <p>5 any way, shape or form?</p> <p>6 A. She said the report should be</p> <p>7 delivered by flash drive.</p> <p>8 Q. By who?</p> <p>9 A. Flash drive. USB key, thumb drive.</p> <p>10 Q. And what was your -- did she ever</p> <p>11 discuss what was going to be on the flash</p> <p>12 drive or USB key?</p> <p>13 A. You mean when?</p> <p>14 Q. What. What was going to be on it?</p> <p>15 A. Oh, the report.</p> <p>16 Q. Did she ever get into detail of what</p> <p>17 the form and substance of the report was</p> <p>18 going to be?</p> <p>19 A. I remember she mentioned that will</p> <p>20 be the valuable information, because she</p> <p>21 presented herself and her team as the best in</p> <p>22 this industry. So she guaranteed again and</p> <p>23 again the information we will receive, they</p> <p>24 are valuable and they are in compliance with</p> <p>25 Mr. Guo's request.</p>
<p style="text-align: right;">Page 79</p> <p>1 Yvette Wang</p> <p>2 anything along those lines?</p> <p>3 A. The form? I don't understand your</p> <p>4 question.</p> <p>5 Q. Flash drive, in person, e-mail; how</p> <p>6 was it supposed to be delivered based on your</p> <p>7 conversations with Mr. Guo and Mr. Han?</p> <p>8 A. Oh, basically, the first time I was</p> <p>9 told how the deliverable or report should be</p> <p>10 transported was, I heard it from Ms. Wallop.</p> <p>11 And she clearly told me that, no e-mail, no</p> <p>12 phone call.</p> <p>13 Q. No written report?</p> <p>14 A. No written report.</p> <p>15 Q. No memo, no memorandum?</p> <p>16 MR. GRENDI: Objection.</p> <p>17 Q. You weren't expecting a memo to be</p> <p>18 delivered?</p> <p>19 A. What do you mean memo?</p> <p>20 Q. A written memorandum.</p> <p>21 A. Are we talking about the --</p> <p>22 Q. The report.</p> <p>23 A. Are we talking about the information</p> <p>24 in a report? I'm confused by you.</p> <p>25 Q. The reports. We're talking about</p>	<p style="text-align: right;">Page 81</p> <p>1 Yvette Wang</p> <p>2 Q. Okay. We will get to the definition</p> <p>3 of valuable. But I just want to be clear.</p> <p>4 Now we're going to deliver flash drives in</p> <p>5 person for these reports, right?</p> <p>6 A. Correct.</p> <p>7 Q. Did you have an understanding of</p> <p>8 what was going to be on the flash drive, not</p> <p>9 just valuable information, but as far as form</p> <p>10 or substance, letters, memorandums,</p> <p>11 handwritten notes?</p> <p>12 A. Oh, okay.</p> <p>13 Q. Recorded conversations, what was</p> <p>14 going to be on there?</p> <p>15 A. That is very helpful. In my</p> <p>16 understanding, based on our discussion about</p> <p>17 the contract, based on --</p> <p>18 Q. In discussion with who, if I can</p> <p>19 just ask you?</p> <p>20 MR. GRENDI: Objection. You</p> <p>21 should let the witness answer, and I</p> <p>22 think it's probably getting difficult</p> <p>23 for the court reporter to keep up.</p> <p>24 MR. SCHMIT: We're doing fine</p> <p>25 here.</p>



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82 to 85

<p style="text-align: right;">Page 82</p> <p>1 Yvette Wang</p> <p>2 Q. Go ahead.</p> <p>3 A. Where should I start?</p> <p>4 Q. Go ahead. Do you need it read back</p> <p>5 here?</p> <p>6 A. Based on my discussion with Ms.</p> <p>7 Wallop, based on my discussion with Mr. Guo,</p> <p>8 that the report could possibly include, like,</p> <p>9 financial, like -- because I remember Ms.</p> <p>10 Wallop described their capability about their</p> <p>11 technology to the bank system.</p> <p>12 For example, before a contract</p> <p>13 signed, she went to New York, meet with Mr.</p> <p>14 Guo, and she described their capability, said</p> <p>15 they already in a certain bank system.</p> <p>16 I'm talking about Ms. Wallop, her</p> <p>17 team. They were in, entered into a certain</p> <p>18 bank's system. And she said her people tried</p> <p>19 to climb on the wall and they did that, and</p> <p>20 they saw the bank information in there. And</p> <p>21 they are huge money.</p> <p>22 And then Ms. Wallop even asked Mr.</p> <p>23 Guo, do you want that money? Give me your</p> <p>24 bank account so we can move the money. And</p> <p>25 Mr. Guo refused immediately. So based on my</p>	<p style="text-align: right;">Page 84</p> <p>1 Yvette Wang</p> <p>2 A. Agreement of format? It could be</p> <p>3 any format, in my understanding. But the</p> <p>4 information Eastern requested is illegal and</p> <p>5 is checkable from resources or database.</p> <p>6 Q. You use the term throughout this</p> <p>7 time --</p> <p>8 MR. GRENDI: Why don't we take</p> <p>9 a break at this time? I know you're</p> <p>10 about to ask a question.</p> <p>11 MR. SCHMIT: Why don't I just</p> <p>12 ask and then we will take a break.</p> <p>13 Q. You used the term several times the</p> <p>14 information must be valuable. What did you</p> <p>15 mean by that? What was your understanding of</p> <p>16 that?</p> <p>17 A. Valuable, in my understanding, that</p> <p>18 should be helpful to the client, as a project</p> <p>19 manager.</p> <p>20 Q. Did you ever discuss -- you keep</p> <p>21 saying "as a project manager." I want to get</p> <p>22 back to that before we break because that's</p> <p>23 important to this whole line of questioning.</p> <p>24 Did Mr. Guo ever explain to you what</p> <p>25 he thought was going to be valuable?</p>
<p style="text-align: right;">Page 83</p> <p>1 Yvette Wang</p> <p>2 understanding that the report should include</p> <p>3 the information or related information about</p> <p>4 financial, which are not our request, which</p> <p>5 should be legal, because Mr. Guo told Ms.</p> <p>6 Wallop clearly, you are doing something</p> <p>7 illegal. And I am not stealing money, and I</p> <p>8 don't need the money.</p> <p>9 Q. We will get back to that. Again, I</p> <p>10 just want to finish one line of questioning</p> <p>11 before we go down that road.</p> <p>12 The report, though, on the flash</p> <p>13 drive, Excel spread sheets, any</p> <p>14 representation that you would be supplied</p> <p>15 with Excel spreadsheets?</p> <p>16 A. You mean the final report?</p> <p>17 Q. Anything. Any report. The flash</p> <p>18 drive you would receive. I want to know</p> <p>19 physically, when you plugged it in and you</p> <p>20 looked at the screen, what did Eastern Profit</p> <p>21 understand would pop up?</p> <p>22 A. This could be like Excel, like Word,</p> <p>23 or PDF or video. Whatever the format.</p> <p>24 Q. Was there a specific agreement as to</p> <p>25 the format of the information?</p>	<p style="text-align: right;">Page 85</p> <p>1 Yvette Wang</p> <p>2 A. At least they are real.</p> <p>3 Q. No, no, did Mr. Guo ever exchange --</p> <p>4 A. Yes, he told me.</p> <p>5 Q. What did he --</p> <p>6 A. They should be real. They should be</p> <p>7 real message.</p> <p>8 Q. What does "real" mean? What do you</p> <p>9 mean by real?</p> <p>10 A. Real means that it's true fact, real</p> <p>11 message. Instead of -- let me give you</p> <p>12 another example, maybe that will be helpful.</p> <p>13 Q. You answered my question though.</p> <p>14 Did you ever talk to Ms. Wallop</p> <p>15 about what Eastern Profit considered was</p> <p>16 valuable? Did you ever go, Ms. Wallop, this</p> <p>17 is what we're looking for, this is what we</p> <p>18 want?</p> <p>19 A. We did. If you review the contract</p> <p>20 signed, which is your Exhibit number 2, you</p> <p>21 can see clearly reports A, B, C, the details.</p> <p>22 That should be information.</p> <p>23 Q. But we already covered that there</p> <p>24 was no exact agreement as to format, right?</p> <p>25 A. Format you mean Excel, Word, PDF,</p>

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86 to 89

<p style="text-align: right;">Page 86</p> <p>1 Yvette Wang</p> <p>2 Power Point?</p> <p>3 Q. Yes. What was going to be on the</p> <p>4 flash drive.</p> <p>5 MR. GRENDI: I want to hop in</p> <p>6 here. We requested a break, I know</p> <p>7 you are continuing down this line of</p> <p>8 questioning and you're obviously</p> <p>9 entitled to. But can we have a</p> <p>10 break, please?</p> <p>11 MR. SCHMIT: Sure. Take a</p> <p>12 break.</p> <p>13 THE WITNESS: Thank you.</p> <p>14 (Whereupon, a brief recess was</p> <p>15 taken.)</p> <p>16 BY MR. SCHMIT:</p> <p>17 Q. We were talking before the break,</p> <p>18 Ms. Wang, about what would be considered,</p> <p>19 quote unquote, valuable information.</p> <p>20 Did you ever discuss that with Ms.</p> <p>21 Wallop or Mike Waller, the other individual</p> <p>22 you've mentioned?</p> <p>23 A. About what?</p> <p>24 Q. About what you considered to be</p> <p>25 valuable or under the contract.</p>	<p style="text-align: right;">Page 88</p> <p>1 Yvette Wang</p> <p>2 Mr. Waller about what the definition of what</p> <p>3 you said is, quote unquote, valuable would</p> <p>4 be?</p> <p>5 MR. GRENDI: Objection. You</p> <p>6 can answer.</p> <p>7 A. Can you repeat your question?</p> <p>8 MR. SCHMIT: Can you read it</p> <p>9 back?</p> <p>10 (Whereupon, at this time, the requested</p> <p>11 portion was read by the reporter.)</p> <p>12 A. Sorry, I still -- I don't quite</p> <p>13 understand your question. So you're talking</p> <p>14 about, am I aware Mr. Guo discussed with Ms.</p> <p>15 Wallop and Mike about the valuable, the</p> <p>16 definition of valuable?</p> <p>17 Q. What he would consider valuable</p> <p>18 under the contract.</p> <p>19 A. I believe I did.</p> <p>20 Q. You believe you did with who?</p> <p>21 A. Mr. Guo discussed it with them.</p> <p>22 Q. Okay. And why do you believe that?</p> <p>23 A. Because Mr. Guo requested their</p> <p>24 things or they offered their things. I mean,</p> <p>25 this is the proof, this is the agreement.</p>
<p style="text-align: right;">Page 87</p> <p>1 Yvette Wang</p> <p>2 A. The valuable, the first thing they</p> <p>3 should be truth, they should be true --</p> <p>4 Q. No, no, did you discuss it?</p> <p>5 A. Discuss it?</p> <p>6 Q. Did you discuss your definition of</p> <p>7 valuable with either Ms. Wallop or Mr.</p> <p>8 Waller?</p> <p>9 A. I didn't.</p> <p>10 Q. Do you know of anybody on behalf of</p> <p>11 Eastern Profit that did?</p> <p>12 A. I believe Mr. Guo discussed it with</p> <p>13 them.</p> <p>14 Q. Why do you believe that?</p> <p>15 A. Why I believe that? Because after</p> <p>16 the discussion, I guess, again, they come up</p> <p>17 this definition (indicating). So I read this</p> <p>18 and I understand --</p> <p>19 Q. What are you pointing to?</p> <p>20 A. The page one until page two with all</p> <p>21 the definitions regarding A, B, and C</p> <p>22 research.</p> <p>23 Q. I don't understand what's in the</p> <p>24 contract, though. Were you aware of any</p> <p>25 discussions Mr. Guo had with Ms. Wallop or</p>	<p style="text-align: right;">Page 89</p> <p>1 Yvette Wang</p> <p>2 Q. I mean, were you present for any</p> <p>3 conversations about, you know, Gee, Ms.</p> <p>4 Wallop, this is what I would consider</p> <p>5 valuable, this is what I'm looking for?</p> <p>6 A. Thank you. That is more easier for</p> <p>7 me. No, I didn't. And I was absent in the</p> <p>8 very beginning of this project. So in the</p> <p>9 very beginning, which means before I started</p> <p>10 to be involved in this project, and Mr. Guo</p> <p>11 and Ms. Wallop and Mike and Mr. Han, you</p> <p>12 know, Mr. Han Lianchao, we say L.C. in all</p> <p>13 the correspondence, they discussed about</p> <p>14 those things, I believe.</p> <p>15 Q. Why do you believe that?</p> <p>16 A. Because come out with this</p> <p>17 (indicating). Otherwise where are they come</p> <p>18 from?</p> <p>19 Q. Are you aware of any specific</p> <p>20 conversations along those lines, though?</p> <p>21 A. I don't understand. Am I aware of</p> <p>22 any conversation?</p> <p>23 Q. Yes.</p> <p>24 A. Yes.</p> <p>25 Q. Which ones? When did they take</p>



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90 to 93

<p style="text-align: right;">Page 90</p> <p>1 Yvette Wang</p> <p>2 place? Who participated and what was said?</p> <p>3 MR. GRENDI: Objection. You</p> <p>4 can answer.</p> <p>5 A. I will answer that. That take place</p> <p>6 in New York.</p> <p>7 Q. Okay.</p> <p>8 A. And Ms. Wallop and Mike, they came</p> <p>9 to New York to Mr. Guo, his apartment and did</p> <p>10 a couple of meetings together with L.C. about</p> <p>11 this project.</p> <p>12 Q. And who is L.C. again?</p> <p>13 A. Lianchao. Han Lianchao.</p> <p>14 Q. And do they call in your text</p> <p>15 messages Mr. Guo, New York, sometimes?</p> <p>16 A. Correct, yes.</p> <p>17 Q. And when was this meeting?</p> <p>18 A. My guess is in November, start from</p> <p>19 November, something, October or November.</p> <p>20 Because I start to get involved by the end of</p> <p>21 December. So before me, that is my guess.</p> <p>22 It should have like in December or the</p> <p>23 beginning or mid of -- no, in November or the</p> <p>24 beginning or mid of December. That is my</p> <p>25 guess.</p>	<p style="text-align: right;">Page 92</p> <p>1 Yvette Wang</p> <p>2 them.</p> <p>3 Q. Well, you're representing them here</p> <p>4 today. You recognize that, right?</p> <p>5 A. Yes.</p> <p>6 Q. So you, as a representative, are not</p> <p>7 aware of any books or records that belong to</p> <p>8 Eastern Profit?</p> <p>9 MR. GRENDI: Objection.</p> <p>10 You can answer.</p> <p>11 A. If I may, without offense, I should</p> <p>12 be defined -- I represent them with limited</p> <p>13 power of attorney on this project. So if you</p> <p>14 ask me the whole history of the records of</p> <p>15 Eastern, I'm sorry, I cannot help.</p> <p>16 Q. No, I'm not -- do they exist? Do</p> <p>17 you have any reason to believe they exist?</p> <p>18 A. I didn't ask. I don't know.</p> <p>19 Q. What have you done to prepare for</p> <p>20 today's deposition, other than look at the</p> <p>21 contract and the complaint?</p> <p>22 A. Went through the exhibits, I believe</p> <p>23 they are there. And went through some of</p> <p>24 the -- I didn't went through all of it</p> <p>25 because I don't have time. So roughly went</p>
<p style="text-align: right;">Page 91</p> <p>1 Yvette Wang</p> <p>2 Q. You weren't at this meeting in</p> <p>3 New York, though?</p> <p>4 A. I didn't attend the meeting about</p> <p>5 this project with all of them together. I</p> <p>6 didn't.</p> <p>7 Q. In preparation for today's</p> <p>8 deposition, did you attempt to educate</p> <p>9 yourself on what may have occurred at that</p> <p>10 meeting?</p> <p>11 A. No, I didn't.</p> <p>12 Q. What have you done in preparation of</p> <p>13 today's deposition?</p> <p>14 A. What I have done?</p> <p>15 Q. What have you done to prepare for</p> <p>16 today's deposition?</p> <p>17 A. Oh, I went through the, like the</p> <p>18 contract, the complaint, some documents which</p> <p>19 from my lawyer.</p> <p>20 Q. Did you go back to any books or</p> <p>21 records of Eastern Profit to prepare?</p> <p>22 A. No. I didn't.</p> <p>23 Q. Are there any books or records for</p> <p>24 Eastern Profit? Do they exist?</p> <p>25 A. I have no idea. You should ask</p>	<p style="text-align: right;">Page 93</p> <p>1 Yvette Wang</p> <p>2 through all these papers.</p> <p>3 Q. In other words, you looked at</p> <p>4 documents that were produced in this</p> <p>5 litigation?</p> <p>6 A. Produced?</p> <p>7 Q. Provided. Like, that are -- that</p> <p>8 you gave to us or we gave to you in the</p> <p>9 discovery process.</p> <p>10 A. Because that happened almost like</p> <p>11 one year ago. So I went through this paper,</p> <p>12 trying to refresh my memory because I don't</p> <p>13 remember quite clear some of the things.</p> <p>14 Q. In other words, the events at issue</p> <p>15 happened like a year ago; is that what you're</p> <p>16 saying?</p> <p>17 A. What do you mean?</p> <p>18 Q. You said something happened a year</p> <p>19 ago, so I had to refresh my recollection.</p> <p>20 What happened a year ago?</p> <p>21 A. This project.</p> <p>22 Q. That's what I was asking.</p> <p>23 A. Yes. That's why, you know, some</p> <p>24 dates I don't remember. It's what you told</p> <p>25 me, yeah.</p>

<p style="text-align: right;">Page 94</p> <p>1 Yvette Wang</p> <p>2 Q. Did you meet or speak with anybody</p> <p>3 in order to educate yourself about Eastern</p> <p>4 Profit?</p> <p>5 A. About Eastern Profit, no.</p> <p>6 Q. Did you meet with your attorney to</p> <p>7 discuss Eastern Profit?</p> <p>8 A. No, I didn't.</p> <p>9 Q. Did you have any telephone --</p> <p>10 MR. GRENDI: Let me pop in. I</p> <p>11 think there must be some kind of</p> <p>12 misunderstanding here. Because we</p> <p>13 did meet to prepare for this 30(b)(6)</p> <p>14 deposition on Tuesday. I think maybe</p> <p>15 she's confused about the designee as</p> <p>16 her attorney.</p> <p>17 A. My understanding, you mean discuss,</p> <p>18 my attorney did ask me -- I don't know.</p> <p>19 MR. GRENDI: Hold on, stop,</p> <p>20 stop. I just want to be clear, she</p> <p>21 shouldn't be discussing what I</p> <p>22 discussed with her. I am just saying</p> <p>23 that was preparation for this</p> <p>24 30(b)(6).</p> <p>25 Q. So on Tuesday you met with the</p>	<p style="text-align: right;">Page 96</p> <p>1 Yvette Wang</p> <p>2 spoken with anybody else about today's</p> <p>3 deposition?</p> <p>4 A. My colleagues. I told them don't</p> <p>5 call me, because I will be in deposition.</p> <p>6 Q. So logistically, logistics?</p> <p>7 A. Yes.</p> <p>8 Q. But the substance of the deposition</p> <p>9 or to educate yourself about what Eastern</p> <p>10 Profit is about, you didn't speak with</p> <p>11 anybody else?</p> <p>12 A. No.</p> <p>13 Q. How about Mr. Chung Han, the</p> <p>14 principal of Eastern?</p> <p>15 A. About this deposition?</p> <p>16 Q. Yes.</p> <p>17 A. No, I didn't.</p> <p>18 Q. What is his exact position with</p> <p>19 Eastern?</p> <p>20 A. He's the president of Eastern. It</p> <p>21 should be on the paper here.</p> <p>22 Q. It just says he's a principal.</p> <p>23 A. Okay, the principal of Eastern.</p> <p>24 Q. What does that mean?</p> <p>25 A. You mean my understanding?</p>
<p style="text-align: right;">Page 95</p> <p>1 Yvette Wang</p> <p>2 gentleman to your right?</p> <p>3 A. Yes.</p> <p>4 Q. Was anybody else present?</p> <p>5 A. No. Only me and him.</p> <p>6 Q. How long did you meet for?</p> <p>7 A. Like two, three hours. Two hours.</p> <p>8 Q. And you reviewed the documents that</p> <p>9 we have identified?</p> <p>10 A. Yes.</p> <p>11 Q. Did you speak with Mr. Guo?</p> <p>12 A. About what?</p> <p>13 Q. About this deposition. Or Eastern</p> <p>14 Profit, in preparation for this deposition.</p> <p>15 A. I told him my date.</p> <p>16 Q. Did you ask him any questions?</p> <p>17 A. I didn't yet. What do you want me</p> <p>18 to ask? I ask.</p> <p>19 MR. GRENDI: Hold on. I'm just</p> <p>20 going to pop in here. He's just</p> <p>21 asking questions today, and you can</p> <p>22 answer them. You don't need to offer</p> <p>23 anything.</p> <p>24 Q. Other than that you've reviewed some</p> <p>25 documents, you met with Zachary, have you</p>	<p style="text-align: right;">Page 97</p> <p>1 Yvette Wang</p> <p>2 Q. Yes.</p> <p>3 A. Boss. I don't know. I don't know</p> <p>4 his official title.</p> <p>5 Q. Is he an officer, director?</p> <p>6 A. I don't know.</p> <p>7 Q. Do you know what his duties and</p> <p>8 responsibilities are?</p> <p>9 A. I don't know.</p> <p>10 Q. How did you know he was a principal?</p> <p>11 A. Mr. Guo told me.</p> <p>12 Q. If you look at Exhibit 3, would you</p> <p>13 have personal knowledge of any of these</p> <p>14 answers? Maybe you can just point out the</p> <p>15 ones to which you would have personal</p> <p>16 knowledge.</p> <p>17 A. Personal knowledge about what?</p> <p>18 Q. About the answers. Because you</p> <p>19 verified these interrogatory responses and</p> <p>20 I'm just wondering, you know, which ones you</p> <p>21 knew personally, and if so, I'd like to know</p> <p>22 how you came up with the information for</p> <p>23 those responses.</p> <p>24 MR. GRENDI: I'm just going to</p> <p>25 object as compound. Do you want to</p>

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98 to 101

<p style="text-align: right;">Page 98</p> <p>1 Yvette Wang</p> <p>2 go through them? I mean, there's</p> <p>3 quite a few.</p> <p>4 MR. SCHMIT: I don't think it's</p> <p>5 going to take too long. There's not</p> <p>6 too many.</p> <p>7 Q. Just point out the ones that you had</p> <p>8 personal knowledge of, that you read the</p> <p>9 question and you said here's the answer.</p> <p>10 MR. GRENDI: I'm objecting</p> <p>11 again. The witness will have to read</p> <p>12 through these and go one by one.</p> <p>13 MR. SCHMIT: You're kind of</p> <p>14 coaching the witness now.</p> <p>15 Q. Can you answer the question?</p> <p>16 MR. GRENDI: Hold on,</p> <p>17 objection. I'm not trying to coach</p> <p>18 the witness.</p> <p>19 MR. SCHMIT: I've asked the</p> <p>20 question. She can react accordingly.</p> <p>21 MR. GRENDI: You can answer.</p> <p>22 A. Then are you asking that we go</p> <p>23 through all the -- because this is --</p> <p>24 Q. I have a question. Let me ask you</p> <p>25 one way. Do you have personal knowledge of</p>	<p style="text-align: right;">Page 100</p> <p>1 Yvette Wang</p> <p>2 was a principal.</p> <p>3 Q. So you had to be told that when you</p> <p>4 saw the question, when you verified it,</p> <p>5 somebody told you that information, right?</p> <p>6 A. That's right.</p> <p>7 Q. So you were educated on it. Is that</p> <p>8 true with each of these answers? That's what</p> <p>9 I'm trying to get at.</p> <p>10 A. Correct.</p> <p>11 MR. GRENDI: Objection. But</p> <p>12 you can answer.</p> <p>13 Q. So with each of these answers,</p> <p>14 somebody had to tell you, with each of these</p> <p>15 questions somebody had to tell you what the</p> <p>16 answers were before you could verify it,</p> <p>17 right?</p> <p>18 MR. GRENDI: Objection. You</p> <p>19 can answer.</p> <p>20 A. Yes.</p> <p>21 Q. Now, for example, who told you the</p> <p>22 answer to number two?</p> <p>23 A. Mr. Guo.</p> <p>24 Q. How about the answer to number four?</p> <p>25 A. Who told me this, right?</p>
<p style="text-align: right;">Page 99</p> <p>1 Yvette Wang</p> <p>2 any of the answers?</p> <p>3 A. I have to go through.</p> <p>4 Q. Okay. Go through, take your time.</p> <p>5 (Witness peruses document.)</p> <p>6 A. Personal knowledge, okay.</p> <p>7 (Witness peruses document.)</p> <p>8 A. Okay. Which one you want to ask?</p> <p>9 Q. The question is, just identify which</p> <p>10 ones you answered based on personal</p> <p>11 knowledge.</p> <p>12 A. Based on my personal knowledge, I</p> <p>13 signed here that this is based on the best of</p> <p>14 my personal knowledge.</p> <p>15 Q. Okay. The best of your personal</p> <p>16 knowledge?</p> <p>17 A. Yes.</p> <p>18 Q. Which ones?</p> <p>19 A. All of them.</p> <p>20 Q. So you knew that Mr. Han, prior to</p> <p>21 seeing these interrogatories, was a principal</p> <p>22 of Eastern Profit?</p> <p>23 A. Which question?</p> <p>24 Q. Number two.</p> <p>25 A. Correct. Here, yes, I was told he</p>	<p style="text-align: right;">Page 101</p> <p>1 Yvette Wang</p> <p>2 Q. Yes.</p> <p>3 A. Mr. Guo.</p> <p>4 Q. What is Mr. Guo's relationship with</p> <p>5 Eastern Profit?</p> <p>6 MS. TESKE: Object.</p> <p>7 A. I believe I said that before.</p> <p>8 Q. Well, tell me again.</p> <p>9 MR. GRENDI: Objection. You</p> <p>10 can answer.</p> <p>11 A. I said he is advisor and consultant</p> <p>12 to Eastern.</p> <p>13 Q. You mentioned a client -- you</p> <p>14 mentioned the client a couple of times. Is</p> <p>15 Eastern Profit a client of New York Golden</p> <p>16 Springs?</p> <p>17 MR. GRENDI: Objection. You</p> <p>18 can answer.</p> <p>19 A. You asked that question before.</p> <p>20 Q. Is it?</p> <p>21 A. I said no, there's no official</p> <p>22 contract.</p> <p>23 Q. Is there an unofficial contract?</p> <p>24 A. No.</p> <p>25 Q. Do you work for anybody other than</p>

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102 to 105

<p style="text-align: right;">Page 102</p> <p>1 Yvette Wang</p> <p>2 New York Golden Springs?</p> <p>3 A. No.</p> <p>4 Q. Who signs your paychecks when you're</p> <p>5 paid?</p> <p>6 MR. GRENDI: Objection.</p> <p>7 MR. SCHMIT: That's a fair</p> <p>8 question. I'm not asking amounts.</p> <p>9 It's a totally fair question.</p> <p>10 There's no objection to that.</p> <p>11 MR. GRENDI: You can answer.</p> <p>12 Q. What entity pays you when you look</p> <p>13 at your paycheck?</p> <p>14 A. I refuse to answer, it's too</p> <p>15 personal.</p> <p>16 MR. GRENDI: I'm not</p> <p>17 instructing the witness to do</p> <p>18 anything.</p> <p>19 I said you can answer the</p> <p>20 question.</p> <p>21 Q. I'm not asking the amount. When you</p> <p>22 get a paycheck, what entity or individual</p> <p>23 does it come from?</p> <p>24 A. Golden Spring.</p> <p>25 Q. When you had to discuss this</p>	<p style="text-align: right;">Page 104</p> <p>1 Yvette Wang</p> <p>2 Q. Yes. If you need more time to</p> <p>3 review it.</p> <p>4 (Witness peruses document.)</p> <p>5 A. Okay. Thank you, I'm done.</p> <p>6 Q. And just for Lianchao Han, you see</p> <p>7 his name at the top?</p> <p>8 A. Yes.</p> <p>9 Q. Who is that again?</p> <p>10 A. A gentleman from D.C.</p> <p>11 Q. From Washington D.C.?</p> <p>12 A. Yes.</p> <p>13 Q. Does he work for Mr. Guo? Does he</p> <p>14 work for Eastern Profit? Who does he work</p> <p>15 for?</p> <p>16 A. I don't know he works for. But he</p> <p>17 doesn't work for Mr. Guo and Eastern.</p> <p>18 Q. He doesn't work for New York Golden</p> <p>19 Springs?</p> <p>20 A. No.</p> <p>21 Q. Why is he discussing the contract?</p> <p>22 A. I don't know.</p> <p>23 Q. He seems to be discussing the</p> <p>24 contract on behalf of Eastern Profit, right?</p> <p>25 A. It seems like, yes.</p>
<p style="text-align: right;">Page 103</p> <p>1 Yvette Wang</p> <p>2 project, other than -- I'm not talking about</p> <p>3 Ms. Wallop or Mr. Waller, did you have</p> <p>4 conversations with anybody during the</p> <p>5 negotiations or execution of the agreement,</p> <p>6 other than Mr. Guo?</p> <p>7 A. No.</p> <p>8 MR. SCHMIT: If I can have this</p> <p>9 marked as Exhibit 5.</p> <p>10 (Whereupon, at this time, the</p> <p>11 reporter marked the above-mentioned</p> <p>12 screen shot of text messages as Wang</p> <p>13 Exhibit 5 for identification.)</p> <p>14 BY MR. SCHMIT:</p> <p>15 Q. I'm going to hand you what's been</p> <p>16 marked as Exhibit 5.</p> <p>17 A. Thank you.</p> <p>18 Q. If you could just -- it's a series</p> <p>19 of screen shots of text messages, SVUS 61</p> <p>20 through 76.</p> <p>21 If you could just take a moment and</p> <p>22 review it and let me know when you're ready</p> <p>23 to answer any questions.</p> <p>24 (Witness peruses document.)</p> <p>25 A. Okay. You want me to finish?</p>	<p style="text-align: right;">Page 105</p> <p>1 Yvette Wang</p> <p>2 Q. You don't know why?</p> <p>3 A. I don't know.</p> <p>4 Q. You don't know -- what was your</p> <p>5 understanding of his involvement in the</p> <p>6 project?</p> <p>7 A. Correct. My understanding, I heard</p> <p>8 this Mr. Han, he is a friend of Wallop and</p> <p>9 Mike. And he, obviously, help translation</p> <p>10 for Mr. Guo as well. That is basically what</p> <p>11 I know.</p> <p>12 Q. What is your understanding of the</p> <p>13 relationship between Mr. Guo and Lianchao</p> <p>14 Han?</p> <p>15 A. To me, it seems like they are</p> <p>16 friends as well.</p> <p>17 Q. Do you know how long Mr. Han has</p> <p>18 known Mr. Guo?</p> <p>19 A. I don't know.</p> <p>20 Q. Estimate?</p> <p>21 A. Estimate?</p> <p>22 MS. TESKE: Object.</p> <p>23 MR. GRENDI: Objection.</p> <p>24 A. I don't know.</p> <p>25 Q. A couple of years, five years, ten</p>

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106 to 109

<p style="text-align: right;">Page 106</p> <p>1 Yvette Wang</p> <p>2 years?</p> <p>3 MS. TESKE: Same objection.</p> <p>4 MR. GRENDI: Same objection.</p> <p>5 A. I don't know.</p> <p>6 Q. Do you have any idea?</p> <p>7 A. I don't think that long, I mean, my</p> <p>8 guess.</p> <p>9 Q. You've met Mr. Han, right?</p> <p>10 A. Yes, I did.</p> <p>11 Q. When did you first meet him?</p> <p>12 A. In New York.</p> <p>13 Q. What time? When?</p> <p>14 A. Late October, November of 2017.</p> <p>15 Q. Who introduced you?</p> <p>16 A. He was in Mr. Guo's apartment and I</p> <p>17 went there and Mr. Guo introduced him to me.</p> <p>18 Q. What is your understanding of why he</p> <p>19 was with Mr. Guo that day?</p> <p>20 A. My understanding, he's a friend of</p> <p>21 him, otherwise why at his home, right?</p> <p>22 Q. What did Mr. Guo tell you about Mr.</p> <p>23 Han during the introduction?</p> <p>24 A. He said Mr. Han is from Washington</p> <p>25 D.C. And he is a real fighter for Chinese</p>	<p style="text-align: right;">Page 108</p> <p>1 Yvette Wang</p> <p>2 it?</p> <p>3 A. Mr. Guo sent me --</p> <p>4 MR. GRENDI: Objection. You</p> <p>5 can answer.</p> <p>6 A. Mr. Guo sent me the wire receipt,</p> <p>7 which I told you.</p> <p>8 Q. Did you talk with anybody from ACA</p> <p>9 Capital about it?</p> <p>10 A. No, in my memory, no, no.</p> <p>11 Q. Did Mr. Guo -- did you tell Mr. Guo,</p> <p>12 We've got to get this money back, this is</p> <p>13 crazy?</p> <p>14 A. No, I didn't tell him. I mean, why</p> <p>15 should I tell him?</p> <p>16 Q. Do you know what ACA Capital was</p> <p>17 told?</p> <p>18 MR. GRENDI: Objection. You</p> <p>19 can answer.</p> <p>20 A. I don't know. I don't know that.</p> <p>21 Q. Do you know if it was specifically</p> <p>22 told that you have to pull this back because</p> <p>23 no contract has been signed yet?</p> <p>24 A. You mean I was told, right?</p> <p>25 Q. No, no. ACA Capital, they're the</p>
<p style="text-align: right;">Page 107</p> <p>1 Yvette Wang</p> <p>2 rules of law and democracy as well and a very</p> <p>3 good man.</p> <p>4 Q. Do you know, is Mr. Han originally</p> <p>5 from Washington D.C.?</p> <p>6 A. Originally you mean what?</p> <p>7 Q. Like where was he born?</p> <p>8 A. Oh, he was born in Mainland of</p> <p>9 China. He told me.</p> <p>10 Q. Did he know Mr. Guo over in China?</p> <p>11 A. I don't know. But I don't believe</p> <p>12 so. Looks like not, my guess, again.</p> <p>13 Q. Just one more question about the --</p> <p>14 this has nothing do with this exhibit, but</p> <p>15 about the million dollars deposit that ACA</p> <p>16 Capital sent, right, they tried to claw it</p> <p>17 back, right?</p> <p>18 A. To get it back?</p> <p>19 Q. Yes.</p> <p>20 A. Yes. Sorry my language.</p> <p>21 Q. That's fine. Who told them that</p> <p>22 they should try to pull it back?</p> <p>23 A. I don't know.</p> <p>24 Q. Did you go -- when you found out</p> <p>25 about the deposit, how did you find out about</p>	<p style="text-align: right;">Page 109</p> <p>1 Yvette Wang</p> <p>2 ones that were trying to claw the money back?</p> <p>3 A. Oh.</p> <p>4 Q. Do you know specifically what</p> <p>5 instruction they were given or why they were</p> <p>6 doing it?</p> <p>7 A. I don't know that part. I don't</p> <p>8 know.</p> <p>9 Q. Mr. Guo never shared that</p> <p>10 information with you?</p> <p>11 MS. TESKE: Objection.</p> <p>12 MR. GRENDI: Objection.</p> <p>13 Q. Let's go back to Exhibit 5 here. If</p> <p>14 you would turn to production number 65.</p> <p>15 (Witness peruses document.)</p> <p>16 Q. It says at the top, it says, Okay,</p> <p>17 thanks, I don't think the New York guy is</p> <p>18 serious.</p> <p>19 Is it your understanding New York</p> <p>20 guy is a reference to Mr. Guo?</p> <p>21 A. Correct. That is my understanding,</p> <p>22 yes.</p> <p>23 Q. Okay. Do you know who this -- who</p> <p>24 wrote that?</p> <p>25 A. I don't know.</p>

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110 to 113

<p style="text-align: right;">Page 110</p> <p>1 Yvette Wang</p> <p>2 Q. If that's your answer, that's --</p> <p>3 A. I guess, either from Mike or Ms.</p> <p>4 Wallop. That is my guess. Because there's</p> <p>5 only Lianchao's name here.</p> <p>6 Q. Then it says, I have mixed feelings</p> <p>7 about it, he wants to do it but wants to do</p> <p>8 it as cheap as possible.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. And then you can see what the</p> <p>12 response to that.</p> <p>13 Do you know what these folks are</p> <p>14 talking about here?</p> <p>15 MR. GRENDI: Objection. You</p> <p>16 can answer.</p> <p>17 MS. TESKE: Same objection.</p> <p>18 A. I don't know precisely. Because</p> <p>19 this is the conversation between other two</p> <p>20 people.</p> <p>21 Q. Fair enough.</p> <p>22 A. But maybe about this project, I'm</p> <p>23 not sure.</p> <p>24 Q. Was there ever any discussion about</p> <p>25 pricing and Mr. Guo wanting to do it cheaper?</p>	<p style="text-align: right;">Page 112</p> <p>1 Yvette Wang</p> <p>2 Q. If you look at 66, that's the</p> <p>3 production number on the lower right-hand</p> <p>4 corner.</p> <p>5 (Witness peruses document.)</p> <p>6 Q. I talked with him and he says he</p> <p>7 wants to do it, but would like to put in a</p> <p>8 clause in the contract which says if you fail</p> <p>9 to provide the deliverables as defined in the</p> <p>10 scope, you should return the deposit. What</p> <p>11 do you think?</p> <p>12 Do you see that?</p> <p>13 A. I saw this.</p> <p>14 Q. You've seen it before today?</p> <p>15 A. Yes.</p> <p>16 Q. Where have you seen that statement</p> <p>17 before?</p> <p>18 A. We went through the exhibits.</p> <p>19 Q. So on Tuesday you probably saw that?</p> <p>20 A. Yes, probably.</p> <p>21 Q. What is your understanding of what</p> <p>22 Mr. Han is saying there?</p> <p>23 MS. TESKE: Objection.</p> <p>24 A. You mean this message?</p> <p>25 Q. Yes.</p>
<p style="text-align: right;">Page 111</p> <p>1 Yvette Wang</p> <p>2 MS. TESKE: Objection.</p> <p>3 MR. GRENDI: Objection.</p> <p>4 A. With who?</p> <p>5 Q. The project.</p> <p>6 A. I have never had that discussion</p> <p>7 with him.</p> <p>8 Q. So to the best of your knowledge,</p> <p>9 they didn't discuss doing it on the cheap or</p> <p>10 anything along those lines?</p> <p>11 A. I never --</p> <p>12 MR. GRENDI: Objection. You</p> <p>13 can answer.</p> <p>14 A. I never heard cheaper, these words</p> <p>15 from Mr. Guo's mouth.</p> <p>16 Q. Did you hear anything along those</p> <p>17 lines or something to that effect?</p> <p>18 A. Sorry?</p> <p>19 Q. Did you hear words other than</p> <p>20 cheaper, maybe you don't like my word choice.</p> <p>21 A. But close to this meaning, right?</p> <p>22 Q. Yes. Conveying that he would like</p> <p>23 to pay less.</p> <p>24 A. No, no, to me. I didn't hear</p> <p>25 anything about that.</p>	<p style="text-align: right;">Page 113</p> <p>1 Yvette Wang</p> <p>2 MR. GRENDI: Objection.</p> <p>3 A. Okay. You're really trying to ask</p> <p>4 me to guess other people's message.</p> <p>5 Q. No, I'm asking, do you have an</p> <p>6 understanding of what is said there?</p> <p>7 A. Fair enough. Let me read it.</p> <p>8 Q. Please read it.</p> <p>9 A. It looks like Mr. Han was</p> <p>10 communicating with Mr. Guo as well about this</p> <p>11 project, about the deposit, and deliverable</p> <p>12 in the scope. That is my understanding,</p> <p>13 saying, Failed to provide the deliverable as</p> <p>14 defined in the scope, which agreed by both</p> <p>15 sides, or agreed by the contract, and the</p> <p>16 contractor should return the deposit.</p> <p>17 Q. Did a clause like this ever end up</p> <p>18 in the agreement?</p> <p>19 MR. GRENDI: Objection. You</p> <p>20 can answer.</p> <p>21 A. I don't remember this is in the</p> <p>22 final signed contract. No.</p> <p>23 Q. You don't believe it is?</p> <p>24 A. I don't believe that.</p> <p>25 Q. Did you ever discuss it with Mr. Guo</p>

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114 to 117

<p style="text-align: right;">Page 114</p> <p>1 Yvette Wang</p> <p>2 and Mr. Han, that concept?</p> <p>3 A. No, I didn't.</p> <p>4 Q. If you can turn to 73.</p> <p>5 A. Yes.</p> <p>6 Q. It says at the bottom, please call</p> <p>7 F. Do you know who F is?</p> <p>8 A. I guess it's French Wallop, my</p> <p>9 guess.</p> <p>10 Q. Okay. That's your understanding.</p> <p>11 MR. GRENDI: Objection.</p> <p>12 Q. However, it says, Today Y came back</p> <p>13 with major unreasonable changes as thing we</p> <p>14 had agreed on in writing on December 12th.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Who is Y?</p> <p>18 A. I guess that's me.</p> <p>19 Q. It's around the December 30th</p> <p>20 timeframe. Do you recall any changes you had</p> <p>21 asked for, requested at that time?</p> <p>22 A. I don't remember that. I don't</p> <p>23 remember, sorry.</p> <p>24 Q. You don't remember a conversation</p> <p>25 about that or any changes at the end of 2017</p>	<p style="text-align: right;">Page 116</p> <p>1 Yvette Wang</p> <p>2 A. I think so. I believe so. I</p> <p>3 believe so. If there is any, like, main</p> <p>4 discussion, it's about -- should be about</p> <p>5 that.</p> <p>6 Q. How about the deposit concept? Does</p> <p>7 looking at this refresh your recollection</p> <p>8 about any conversations you had about the</p> <p>9 deposit?</p> <p>10 A. No. First discussion about the</p> <p>11 deposit that was -- you remember I said,</p> <p>12 three meetings and one meeting, that was the</p> <p>13 conversation about deposit. And the next one</p> <p>14 is that wire transfer about that one.</p> <p>15 Q. You weren't involved in the</p> <p>16 conversations about putting a clause in the</p> <p>17 agreement that you could claw it back if</p> <p>18 something went bad?</p> <p>19 A. No.</p> <p>20 Q. Or there is a disagreement?</p> <p>21 A. No, I was not involved in that.</p> <p>22 MR. GRENDI: Objection. I just</p> <p>23 want to advise the witness to let him</p> <p>24 finish asking the question before you</p> <p>25 answer.</p>
<p style="text-align: right;">Page 115</p> <p>1 Yvette Wang</p> <p>2 that you agreed or disagreed about?</p> <p>3 A. First, I said I don't remember.</p> <p>4 That doesn't mean I agree or disagree. I</p> <p>5 really don't remember. Because the date, I</p> <p>6 don't remember what happened. And then I</p> <p>7 don't remember like what kind of a</p> <p>8 conversation I came back. No, I don't</p> <p>9 remember that.</p> <p>10 Q. Do you recall any conversations you</p> <p>11 had with Mr. Guo around that time of changes</p> <p>12 he wanted?</p> <p>13 A. I don't remember clearly.</p> <p>14 Q. Do you remember just in a general</p> <p>15 sense?</p> <p>16 A. General sense, still about the</p> <p>17 waterline, because that was the argue, you</p> <p>18 know, the argue points. From the beginning</p> <p>19 throughout the end.</p> <p>20 Q. You guys wanted an a la carte pay as</p> <p>21 the deliverables come in and Strategic Vision</p> <p>22 wanted this waterline concept?</p> <p>23 A. Correct, correct.</p> <p>24 Q. And you guys discussed it at length</p> <p>25 and many phone calls and meetings?</p>	<p style="text-align: right;">Page 117</p> <p>1 Yvette Wang</p> <p>2 THE WITNESS: Sure.</p> <p>3 Q. Did Eastern Profit do any research</p> <p>4 on Strategic Vision?</p> <p>5 A. I don't know.</p> <p>6 Q. You don't know at all?</p> <p>7 A. Sorry, please finish your question.</p> <p>8 Q. I guess -- so you don't know if</p> <p>9 Eastern Profit did any research on Strategic</p> <p>10 Vision or French Wallop or Mike Waller?</p> <p>11 A. I don't know.</p> <p>12 Q. Did Mr. Guo ever instruct you to</p> <p>13 look into either of them or the company in</p> <p>14 general?</p> <p>15 A. No.</p> <p>16 Q. Did he ever inform you of what he</p> <p>17 thought, and I'm talking pre execution,</p> <p>18 inform you of what he knew about French</p> <p>19 Wallop or Mike Waller or Strategic Vision or</p> <p>20 anything along those lines?</p> <p>21 A. Sorry, what is your question?</p> <p>22 Q. Did Mr. Guo ever inform you, prior</p> <p>23 to execution, what he knew or thought about</p> <p>24 either Ms. Wallop, Mike Waller or Strategic</p> <p>25 Vision?</p>



<p style="text-align: right;">Page 118</p> <p>1 Yvette Wang</p> <p>2 A. No. He didn't request me to search</p> <p>3 about them, no.</p> <p>4 Q. Did he ever tell you what he already</p> <p>5 knew about them?</p> <p>6 A. Oh, yes, he did.</p> <p>7 Q. What did he say?</p> <p>8 A. He said, Ms. Wallop and Mike, they</p> <p>9 were introduced to him, and they are from</p> <p>10 Washington D.C. Kind of like -- I don't</p> <p>11 remember clearly. Like they are very</p> <p>12 experienced and they have a lot of resources</p> <p>13 and contacts in Washington D.C. And he heard</p> <p>14 quite a lot of history about the lady and the</p> <p>15 gentleman, which the lady and the gentleman</p> <p>16 told Mr. Guo about. Like, their experience,</p> <p>17 like their family, not too private, like</p> <p>18 their education, like their previous work</p> <p>19 experience, like their clients, especially</p> <p>20 some very important clients of Ms. Wallop and</p> <p>21 Mike. And the project Ms. Wallop and Mike</p> <p>22 they have been done, including very</p> <p>23 significant clients of theirs and their name.</p> <p>24 Yeah, pretty much like that, like,</p> <p>25 they mentioned about their clients include</p>	<p style="text-align: right;">Page 120</p> <p>1 Yvette Wang</p> <p>2 presented those dinners and lunch meetings.</p> <p>3 Q. Did you ever discuss with Mr. Chao</p> <p>4 how -- Lianchao what was said at those</p> <p>5 meetings or if he vetted the information or</p> <p>6 what he thought about Strategic Vision or</p> <p>7 French Wallop or Mike Waller?</p> <p>8 MR. GRENDI: Objection. You</p> <p>9 can answer.</p> <p>10 A. I remember Mr. L.C., he described</p> <p>11 close, similar, like what Mr. Guo described</p> <p>12 to me about Ms. Wallop and Mike. Or if</p> <p>13 something different is that before this</p> <p>14 project, Mr. Han -- I mean, Lianchao, he</p> <p>15 brought Ms. Wallop to Mr. Guo, his apartment,</p> <p>16 tried to sell some real estate property to</p> <p>17 Mr. Guo. So that was before this project.</p> <p>18 And then I remember that was an</p> <p>19 afternoon and Ms. Wallop brought a brochure,</p> <p>20 a house called Evermay, E-V-E-R-M-A-Y, that</p> <p>21 was a house called Evermay. And she kind of</p> <p>22 like tried to sell that house to Mr. Guo.</p> <p>23 Q. Were you present at this meeting?</p> <p>24 A. I was there, yes.</p> <p>25 Q. Hadn't Mr. Guo requested information</p>
<p style="text-align: right;">Page 119</p> <p>1 Yvette Wang</p> <p>2 some Russian officials, some middle east,</p> <p>3 like royal family member official, government</p> <p>4 people. And, oh, yeah, Mr. Guo even show me</p> <p>5 his notebook. There is one page on there,</p> <p>6 and with handwriting some name. And they are</p> <p>7 written by Ms. Wallop. And Ms. Wallop told</p> <p>8 Mr. Guo they are all big clients of hers.</p> <p>9 Yeah, many about that.</p> <p>10 Q. Mr. Guo told you about that?</p> <p>11 A. Yes.</p> <p>12 Q. And what was your understanding of</p> <p>13 when Mr. Guo would have learned all that</p> <p>14 information?</p> <p>15 A. You mean when, right?</p> <p>16 Q. When, yes.</p> <p>17 A. My understanding is in November,</p> <p>18 December, when Ms. Wallop and Mike, they were</p> <p>19 introduced to Mr. Guo. They started to meet,</p> <p>20 have dinner, lunch together. That is the</p> <p>21 time, yes.</p> <p>22 Q. And as far as you know, would</p> <p>23 anybody else, other than Mr. Guo, be present</p> <p>24 at those dinners?</p> <p>25 A. Other people, Han Lianchao, yes, he</p>	<p style="text-align: right;">Page 121</p> <p>1 Yvette Wang</p> <p>2 in real estate?</p> <p>3 A. I don't know he requested or not.</p> <p>4 Q. She just showed up out of the blue</p> <p>5 with a brochure and said, How about this?</p> <p>6 A. Yes.</p> <p>7 MR. GRENDI: Objection. You</p> <p>8 can answer.</p> <p>9 A. Yes. That was -- that's why my</p> <p>10 first knowledge is, I don't know what she is</p> <p>11 doing for business.</p> <p>12 Q. Is that what Mr. Guo said? How did</p> <p>13 he describe the encounter?</p> <p>14 A. What is your question?</p> <p>15 Q. How did Mr. Guo describe the</p> <p>16 encounter to you? Did he say that, Hey, I</p> <p>17 never asked her to do that?</p> <p>18 A. I didn't hear that from him.</p> <p>19 Q. Did he look at the brochure?</p> <p>20 A. Yes, he did.</p> <p>21 Q. Was there any comment, Oh, this is</p> <p>22 the house we talked about or anything along</p> <p>23 those lines?</p> <p>24 A. I don't remember that clearly.</p> <p>25 Q. All right, it could be possible,</p>



<p style="text-align: right;">Page 122</p> <p>1 Yvette Wang</p> <p>2 though, that Mr. Guo requested that</p> <p>3 information and that's why it was brought to</p> <p>4 the meeting, right?</p> <p>5 A. I don't know what happened before</p> <p>6 that meeting. But by that meeting, I saw she</p> <p>7 was showing her brochure, explain the house</p> <p>8 condition, like those kind of stuff.</p> <p>9 Q. But you have no factual information</p> <p>10 about why that brochure was brought to the</p> <p>11 meeting?</p> <p>12 A. I have no idea.</p> <p>13 Q. Mr. Guo didn't tell you why it was</p> <p>14 brought there?</p> <p>15 A. No.</p> <p>16 Q. Did you ask him?</p> <p>17 A. Who ask who?</p> <p>18 Q. Did you ask Mr. Guo?</p> <p>19 A. About that house?</p> <p>20 Q. Why the brochure was being discussed</p> <p>21 at the meeting?</p> <p>22 A. No, I didn't. Because that happens,</p> <p>23 you know, not something quite special, so why</p> <p>24 I ask all the details? No, I didn't.</p> <p>25 Q. Were you aware of any trips to the</p>	<p style="text-align: right;">Page 124</p> <p>1 Yvette Wang</p> <p>2 Q. No?</p> <p>3 A. I didn't ask. Kind of like she</p> <p>4 explained, like there's cameras everywhere in</p> <p>5 D.C., and like the people who looks like</p> <p>6 common walk on the street, they might be like</p> <p>7 spies or agent or some other people. I don't</p> <p>8 remember clearly, something kind of like</p> <p>9 that.</p> <p>10 Q. What time of year was this? When</p> <p>11 was this?</p> <p>12 A. December, before this project. By</p> <p>13 then I don't even know this project or hear</p> <p>14 anything about this.</p> <p>15 Q. But it's in December of 2017, right?</p> <p>16 A. I don't remember the date.</p> <p>17 Q. But the year 2017?</p> <p>18 A. Oh, yes, that's right.</p> <p>19 Q. And you now know that this project</p> <p>20 had been discussed in meetings in October and</p> <p>21 November of this year, right?</p> <p>22 MR. GRENDI: Objection. You</p> <p>23 can answer.</p> <p>24 A. Which project?</p> <p>25 Q. The project we've been discussing</p>
<p style="text-align: right;">Page 123</p> <p>1 Yvette Wang</p> <p>2 Washington D.C. area of where Mr. Guo or his</p> <p>3 representatives were looking for real estate?</p> <p>4 A. After that Evermay house was</p> <p>5 introduced, then Mr. Guo asked me, Oh, you go</p> <p>6 to have a look at that house. Then I went to</p> <p>7 D.C. together with Han Lianchao and together</p> <p>8 with Ms. Wallop and we tried to visit that</p> <p>9 Evermay house.</p> <p>10 Q. Did you visit any other real estate?</p> <p>11 A. Yes. That is -- was a like four</p> <p>12 hours about, four hours drive. And Ms.</p> <p>13 Wallop drove --</p> <p>14 Q. You mean four hours driving around</p> <p>15 D.C.?</p> <p>16 A. Four hours in car. Because Ms.</p> <p>17 Wallop did not allow us to, like, quite</p> <p>18 frequently go out of the car and eat. And</p> <p>19 she said, You guys better stay in the car and</p> <p>20 even put me on the back of the seat. She</p> <p>21 said she doesn't want the camera take picture</p> <p>22 of her and me together. And we were in a</p> <p>23 car --</p> <p>24 Q. Did you ask her why?</p> <p>25 A. She -- I didn't ask.</p>	<p style="text-align: right;">Page 125</p> <p>1 Yvette Wang</p> <p>2 for three hours now.</p> <p>3 A. Okay. What is the question?</p> <p>4 Q. It was discussed among Strategic</p> <p>5 Vision and Mr. Guo prior to you being</p> <p>6 introduced to it?</p> <p>7 A. No. Even now I don't know.</p> <p>8 Q. You don't know when that project was</p> <p>9 first raised?</p> <p>10 A. I have no idea. Even now I have no</p> <p>11 idea.</p> <p>12 Q. Did Mr. Guo ever tell you why he was</p> <p>13 meeting with them?</p> <p>14 A. No.</p> <p>15 Q. In November and October of 2017?</p> <p>16 A. He didn't tell me the reason.</p> <p>17 Q. They were there in New York at his</p> <p>18 apartment having discussions, though, right?</p> <p>19 A. A discuss about what?</p> <p>20 Q. Anything. I'm saying a meeting took</p> <p>21 place. I just want to firm up that you're</p> <p>22 aware of meetings in October and November of</p> <p>23 2017?</p> <p>24 MR. GRENDI: Objection. You</p> <p>25 can answer.</p>

<p style="text-align: right;">Page 126</p> <p>1 Yvette Wang</p> <p>2 A. Yes. Yes, there were -- I heard</p> <p>3 there were meetings.</p> <p>4 Q. You don't know what they were about,</p> <p>5 though?</p> <p>6 A. No.</p> <p>7 Q. And then why were you -- why did you</p> <p>8 go on this trip to D.C. to look at real</p> <p>9 estate?</p> <p>10 A. Because of the Evermay house.</p> <p>11 Q. But why look at it?</p> <p>12 A. Because Ms. Wallop introduced that</p> <p>13 to Mr. Guo and Mr. Guo would like me to have</p> <p>14 a check whether it's worth to buy or purchase</p> <p>15 or introduce to other people. Just let me to</p> <p>16 have a look at that.</p> <p>17 Q. Was he looking to relocate to D.C.?</p> <p>18 MR. GRENDI: Objection.</p> <p>19 MS. TESKE: Same objection.</p> <p>20 MR. GRENDI: I mean, I realized</p> <p>21 that there's an excess here, but</p> <p>22 where is this going? This is about</p> <p>23 real estate.</p> <p>24 MR. SCHMIT: I'm exploring her</p> <p>25 credibility in conversations. This</p>	<p style="text-align: right;">Page 128</p> <p>1 Yvette Wang</p> <p>2 that house?</p> <p>3 A. I don't know.</p> <p>4 Q. Did you ever ask, Why are we looking</p> <p>5 at this house?</p> <p>6 A. I didn't.</p> <p>7 Q. What did you report back to Mr. Guo</p> <p>8 about the house and the trip?</p> <p>9 A. I told him. We had about like four</p> <p>10 hours drive locked in a car, and we were --</p> <p>11 Q. You were locked in the car?</p> <p>12 A. Description. We were not allowed to</p> <p>13 go out of the car, correct, okay? That's</p> <p>14 fair enough. And then Evermay, that house,</p> <p>15 we were supposed to go to visit that house,</p> <p>16 but we didn't get access to go inside of</p> <p>17 there at all.</p> <p>18 So we were driving around, around</p> <p>19 and four hours without clear, like objective</p> <p>20 property, just to look around. And didn't</p> <p>21 even enter into any house. I told him about</p> <p>22 this. And then I told him that Evermay house</p> <p>23 is a neighbor of a very big cemetery. So the</p> <p>24 condition from outside, which I was able to</p> <p>25 view, it's very bad maintained, not very good</p>
<p style="text-align: right;">Page 127</p> <p>1 Yvette Wang</p> <p>2 is well within the 40 yard lines.</p> <p>3 MR. GRENDI: Go ahead.</p> <p>4 A. I don't know.</p> <p>5 Q. You mean, Mr. Guo never told you why</p> <p>6 you had to go look at this house?</p> <p>7 A. No.</p> <p>8 Q. Mr. Lianchao never told you why you</p> <p>9 were in a car for four hours with a woman</p> <p>10 driving around D.C.?</p> <p>11 A. For Evermay, this house.</p> <p>12 Q. But why? You don't know? I mean,</p> <p>13 if you don't know, you don't know.</p> <p>14 MR. GRENDI: Objection. I</p> <p>15 just, if we're having like an</p> <p>16 understanding issue, let's try to</p> <p>17 work it out.</p> <p>18 MR. SCHMIT: I am, that's why</p> <p>19 I'm giving her an out.</p> <p>20 MR. GRENDI: I think just maybe</p> <p>21 slow down with your pace here.</p> <p>22 Because the witness is trying to</p> <p>23 answer and whatever. Just go ahead,</p> <p>24 sorry.</p> <p>25 Q. Do you know why you were looking at</p>	<p style="text-align: right;">Page 129</p> <p>1 Yvette Wang</p> <p>2 condition. Seems like nobody live in there</p> <p>3 for long time.</p> <p>4 Q. And what was Mr. Guo's reaction to</p> <p>5 that report?</p> <p>6 A. He doesn't like cemetery.</p> <p>7 Q. So the presence of the cemetery was</p> <p>8 kind of a show stopper?</p> <p>9 A. Show stopper? What do you mean show</p> <p>10 stopper?</p> <p>11 Q. That would be a deal breaker. He</p> <p>12 wouldn't buy the house next to a cemetery?</p> <p>13 MS. TESKE: Objection.</p> <p>14 A. I don't even know he will buy that</p> <p>15 or not, to be honest with you. But I can</p> <p>16 tell you that is not the house he likes, if I</p> <p>17 may, because that is a neighbor of a huge</p> <p>18 cemetery.</p> <p>19 Q. Did you ever ask Ms. Wallop why she</p> <p>20 didn't think it was a good idea for the three</p> <p>21 of you to be seen together in the D.C. area?</p> <p>22 A. I didn't.</p> <p>23 Q. Why not?</p> <p>24 A. Because that was not polite, right?</p> <p>25 Q. Did you ever ask Mr. Guo, Isn't this</p>

<p style="text-align: right;">Page 130</p> <p>1 Yvette Wang</p> <p>2 a little odd?</p> <p>3 A. I didn't. Because it's not polite,</p> <p>4 to be honest.</p> <p>5 Q. You weren't curious at all?</p> <p>6 A. Curious about what?</p> <p>7 Q. I mean, why do you think -- I mean,</p> <p>8 curious as to why Ms. Wallop thought you</p> <p>9 shouldn't be seen together in D.C.?</p> <p>10 A. I was, to be honest, curious and</p> <p>11 surprised after that four hours drive.</p> <p>12 Because in my understanding, she was going to</p> <p>13 try to sell that property. But I went there,</p> <p>14 at least to have a very, like a check. She</p> <p>15 didn't even get me in that house. And I was</p> <p>16 in the car for four hours, almost like five</p> <p>17 hours. I don't even have --</p> <p>18 Q. You guys didn't discuss during this</p> <p>19 time research at all or the project at all?</p> <p>20 A. Which project, the house?</p> <p>21 Q. The project you're testifying about</p> <p>22 here today.</p> <p>23 A. No, no. No word about that.</p> <p>24 Nothing.</p> <p>25 Q. Now that you know the nature of the</p>	<p style="text-align: right;">Page 132</p> <p>1 Yvette Wang</p> <p>2 to be taken photo by chance me and her</p> <p>3 together. That is my understanding.</p> <p>4 Q. And how did you gain that</p> <p>5 understanding?</p> <p>6 A. Because it's weird. Like she</p> <p>7 specifically told me that I gonna put you in</p> <p>8 the back seat not in front for why reason?</p> <p>9 By then, you know, even she did explain to</p> <p>10 me, I will take whatever, you know, the owner</p> <p>11 of car put me, but she specifically explained</p> <p>12 that to me, made me feel so weird and</p> <p>13 surprised by then, right?</p> <p>14 Q. Do you understand why she might have</p> <p>15 thought it was bad, though, not to be viewed</p> <p>16 with you, given the project that was being</p> <p>17 discussed?</p> <p>18 MR. GRENDI: Objection. You</p> <p>19 can answer.</p> <p>20 A. Still I have no idea about this</p> <p>21 project by then. I just feel it's weird. It</p> <p>22 shouldn't be like that serious because I am</p> <p>23 walking in D.C. and New York every day, I'm</p> <p>24 in D.C. a lot of time, and in New York many</p> <p>25 days. I was never killed, I was never</p>
<p style="text-align: right;">Page 131</p> <p>1 Yvette Wang</p> <p>2 project, does it make sense as to why she</p> <p>3 didn't want to be seen?</p> <p>4 A. Which project, this one?</p> <p>5 Q. Yes.</p> <p>6 MR. GRENDI: I mean, the</p> <p>7 defendant is allowed to be here but</p> <p>8 we don't need commentary.</p> <p>9 Q. When I say "project," we know it's</p> <p>10 getting a little silly. You know the project</p> <p>11 I'm talking about. But I'm just asking you,</p> <p>12 now that you know the nature of the contract,</p> <p>13 do you have a better understanding as to why</p> <p>14 she didn't want any photographs of you guys</p> <p>15 together?</p> <p>16 A. Oh, I probably got your question.</p> <p>17 That's why Wallop did not allow me and</p> <p>18 Lianchao, especially me, go out and in the</p> <p>19 car, because by then, she already know Miles</p> <p>20 Kwok, who is Miles Kwok. And then, my guess,</p> <p>21 again, because she is here, in this room, my</p> <p>22 guess is she is afraid of like, we are like</p> <p>23 Miles Kwok's group of people, and we might</p> <p>24 bring, I don't know some risk or danger to</p> <p>25 her personally. That's why she doesn't want</p>	<p style="text-align: right;">Page 133</p> <p>1 Yvette Wang</p> <p>2 assassinated. And why you're so afraid of be</p> <p>3 together with me?</p> <p>4 Q. Well, wasn't there concern that it</p> <p>5 would expose the fact that Strategic Vision</p> <p>6 was being engaged to do research on certain</p> <p>7 individuals?</p> <p>8 MS. TESKE: Object.</p> <p>9 A. You're talking about the property</p> <p>10 project, real estate or this project?</p> <p>11 Q. This project, the research project.</p> <p>12 A. By then I have no idea about this</p> <p>13 project.</p> <p>14 Q. I know that, ma'am. We went over</p> <p>15 that. You didn't know it when you were</p> <p>16 sitting in the car, but now looking back</p> <p>17 don't you think it made sense that there was</p> <p>18 some concern because Strategic Vision was</p> <p>19 going to be engaged?</p> <p>20 MR. GRENDI: Objection.</p> <p>21 Q. Based on what you know now sitting</p> <p>22 here today?</p> <p>23 A. No, I don't believe there is any</p> <p>24 relationship. And by then, the four hours</p> <p>25 drive, I believe her fear is just, okay,</p>

<p style="text-align: right;">Page 134</p> <p>1 Yvette Wang</p> <p>2 Miles Kwok is the biggest dissident of</p> <p>3 Chinese government. And she doesn't want to</p> <p>4 get together with those group of people. I</p> <p>5 mean, Miles Kwok's group of people. And then</p> <p>6 I don't think that fear or that experience is</p> <p>7 related to this project.</p> <p>8 Let me tell you why. Because when</p> <p>9 this project show up in front of me, my first</p> <p>10 reaction is, okay, what is job of this lady?</p> <p>11 And later on, with more meetings together</p> <p>12 with them, I was educated, Ms. Wallop and</p> <p>13 Mike, they are super very much experienced in</p> <p>14 investigation and research, which they</p> <p>15 described themselves in front of me. And</p> <p>16 from those meetings, I feel no fear, they</p> <p>17 have no fear at all to, like, Miles Guo or</p> <p>18 me. So it's totally separated.</p> <p>19 Q. Why was the agreement, if you look</p> <p>20 at Exhibit 2, it says here both parties agree</p> <p>21 that the nature of this contract and work</p> <p>22 related to it is highly confidential.</p> <p>23 A. Yes, I saw this.</p> <p>24 Q. What is your understanding of that</p> <p>25 phrase?</p>	<p style="text-align: right;">Page 136</p> <p>1 Yvette Wang</p> <p>2 Q. It's a three-page letter, dated</p> <p>3 February 23rd, 2018.</p> <p>4 Do you have that in front of you?</p> <p>5 A. Yes.</p> <p>6 Q. Have you ever seen this before?</p> <p>7 A. Yes, I did.</p> <p>8 Q. Did you look at it, just a yes or no</p> <p>9 to this, did you look at it in draft form?</p> <p>10 A. I'm sorry, what is your question?</p> <p>11 Q. Did you see it in draft form?</p> <p>12 A. Draft form meaning?</p> <p>13 Q. Prior to being executed.</p> <p>14 A. Yes, I did, I did.</p> <p>15 Q. Did you provide any input into it?</p> <p>16 A. Yes, I did.</p> <p>17 Q. Who else would have provided input</p> <p>18 into this letter?</p> <p>19 A. Who else provided information to</p> <p>20 this, right?</p> <p>21 Q. Yes.</p> <p>22 MR. GRENDI: Objection. You</p> <p>23 can answer.</p> <p>24 A. Mr. Guo.</p> <p>25 Q. Anybody else?</p>
<p style="text-align: right;">Page 135</p> <p>1 Yvette Wang</p> <p>2 A. Highly confidential, both parties,</p> <p>3 what is my understanding? My understanding</p> <p>4 is that all the information related to this</p> <p>5 project or this contract, should be kept</p> <p>6 confidential.</p> <p>7 Q. And at whose request was that?</p> <p>8 A. I believe, this is my guess, again,</p> <p>9 because when I have the draft, it's -- if my</p> <p>10 memory works well, it's already there. So my</p> <p>11 guess is, this is a request from both sides.</p> <p>12 Q. And do you know why both sides</p> <p>13 wanted it that way?</p> <p>14 A. I don't know, but I feel this is a</p> <p>15 common sense.</p> <p>16 MR. SCHMIT: If I can have this</p> <p>17 marked as Exhibit 6.</p> <p>18 (Whereupon, at this time, the</p> <p>19 reporter marked the above-mentioned</p> <p>20 three-page letter as Wang Exhibit 6</p> <p>21 for identification.)</p> <p>22 BY MR. SCHMIT:</p> <p>23 Q. Ms. Wang, I'm going to hand you</p> <p>24 what's been marked as deposition Exhibit 6.</p> <p>25 A. Thank you.</p>	<p style="text-align: right;">Page 137</p> <p>1 Yvette Wang</p> <p>2 A. My lawyer.</p> <p>3 Q. And just, if -- when you say my</p> <p>4 lawyer, who are you referring to?</p> <p>5 A. Foley Hoag, H-O-A-G, people.</p> <p>6 Q. Did they represent Eastern Profit in</p> <p>7 connection with the negotiation of the</p> <p>8 agreement as well?</p> <p>9 A. One of their partner, they did.</p> <p>10 Q. Who was that?</p> <p>11 A. Gare, G-A-R-E, Smith.</p> <p>12 Q. So Mr. Smith would have looked at</p> <p>13 the agreement that we've marked as Exhibit 2</p> <p>14 prior to Eastern Profit executing it?</p> <p>15 MR. GRENDI: Objection. You</p> <p>16 can answer.</p> <p>17 A. Far before this version. You know</p> <p>18 what I mean?</p> <p>19 Q. No, I don't.</p> <p>20 A. Okay. So the very, very, very</p> <p>21 beginning, when I first time visited Ms.</p> <p>22 Wallop to discuss about this contract.</p> <p>23 Q. Was there a draft on the table or</p> <p>24 did you discuss concepts?</p> <p>25 A. I asked him to --</p>

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<p style="text-align: right;">Page 138</p> <p>1 Yvette Wang</p> <p>2 MR. GRENDI: Objection, stop,</p> <p>3 hold on. I don't want you to</p> <p>4 reveal --</p> <p>5 MR. SCHMIT: Just yes or no,</p> <p>6 sorry.</p> <p>7 MR. GRENDI: I just want to</p> <p>8 instruct the witness on this.</p> <p>9 Don't reveal any conversations</p> <p>10 you had with any lawyers.</p> <p>11 THE WITNESS: Okay.</p> <p>12 MR. GRENDI: Why don't we just</p> <p>13 roll that back and you can ask yes or</p> <p>14 no, please?</p> <p>15 MR. SCHMIT: Can you just</p> <p>16 repeat it?</p> <p>17 (Whereupon, at this time, the requested</p> <p>18 portion was read by the reporter.)</p> <p>19 A. Yes.</p> <p>20 Q. And was Ms. Wallop present for this</p> <p>21 meeting?</p> <p>22 A. No.</p> <p>23 Q. Who else -- was anybody else in the</p> <p>24 room when you discussed this?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 140</p> <p>1 Yvette Wang</p> <p>2 A. January 26th. And by that meeting,</p> <p>3 Mike and Ms. Wallop apologized many times to</p> <p>4 Mr. Guo and me, saying they had internal</p> <p>5 communication problem, misunderstanding</p> <p>6 between Mike and their project manager about</p> <p>7 the report, and about the delay. So they</p> <p>8 officially apologized many, many times.</p> <p>9 Q. At that meeting?</p> <p>10 A. Yes. And then they offered to Mr.</p> <p>11 Guo and me, saying that because of our</p> <p>12 mistake and our internal communication</p> <p>13 problem with my project manager, and we offer</p> <p>14 this ten days to you. So that was the ten</p> <p>15 days came from.</p> <p>16 Q. And simply that would mean less</p> <p>17 would be due under the contract?</p> <p>18 MR. GRENDI: Objection. You</p> <p>19 can answer.</p> <p>20 A. Sorry, I don't understand.</p> <p>21 Q. That would mean less money would be</p> <p>22 due under the contract, right?</p> <p>23 MR. GRENDI: Same objection, go</p> <p>24 ahead.</p> <p>25 A. In my understanding, that means the</p>
<p style="text-align: right;">Page 139</p> <p>1 Yvette Wang</p> <p>2 Q. Was Mr. Guo or anybody on the phone?</p> <p>3 A. No.</p> <p>4 Q. If you look at -- it's the third</p> <p>5 paragraph of the letter. It says, Eastern</p> <p>6 agreed to delay the start of the contract by</p> <p>7 ten days from January 6th to January 16th.</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. And January 6th is the day the</p> <p>11 contract was executed, right?</p> <p>12 A. Correct.</p> <p>13 Q. Is that true?</p> <p>14 A. Correct, that was -- that is true.</p> <p>15 Q. Why was that done?</p> <p>16 A. You mean the delay?</p> <p>17 Q. Yes.</p> <p>18 A. Oh, that was on January 26th. The</p> <p>19 last meeting was Wallop, Mike, Guo and me</p> <p>20 together at New York. By that meeting, Mike</p> <p>21 and Ms. Wallop finally presented their report</p> <p>22 to Mr. Guo and me, which they already delayed</p> <p>23 about like three weeks -- three weeks.</p> <p>24 Q. I'm sorry, what day was this</p> <p>25 meeting?</p>	<p style="text-align: right;">Page 141</p> <p>1 Yvette Wang</p> <p>2 date we paid. I mean, the one month we paid</p> <p>3 should start from January 16th instead of</p> <p>4 January 6th.</p> <p>5 Q. And what was the purpose of this</p> <p>6 letter that we've marked as Exhibit 6?</p> <p>7 A. The purpose was to terminate,</p> <p>8 officially terminate the contract, and to</p> <p>9 advise Strategic Vision return the deposit,</p> <p>10 otherwise Eastern is going to take legal</p> <p>11 action.</p> <p>12 Q. So this was the official termination</p> <p>13 notice of the agreement, right?</p> <p>14 MR. GRENDI: Objection. You</p> <p>15 can answer.</p> <p>16 A. Correct.</p> <p>17 Q. Why did Eastern Profit believe it</p> <p>18 was entitled to receive the million dollar</p> <p>19 deposit back?</p> <p>20 MR. GRENDI: Objection. You</p> <p>21 can answer.</p> <p>22 MR. SCHMIT: What could</p> <p>23 possibly be the objection to that</p> <p>24 question?</p> <p>25 MR. GRENDI: Go ahead.</p>

<p style="text-align: right;">Page 142</p> <p>1 Yvette Wang</p> <p>2 A. Because Eastern believes or Mr. Guo</p> <p>3 believes they are cheated and Strategic</p> <p>4 Vision, they are liar and they did fraud to</p> <p>5 the client.</p> <p>6 Q. Who is the client in that statement?</p> <p>7 MS. TESKE: Object.</p> <p>8 A. Eastern Profit Corporation Limited,</p> <p>9 the client in this contract (indicating).</p> <p>10 Q. Specifically, why was Eastern Profit</p> <p>11 terminating this contract, as opposed to</p> <p>12 trying to work it out or move forward with</p> <p>13 the agreement?</p> <p>14 A. Why? In my understanding, because</p> <p>15 after the January 26th meeting, remember,</p> <p>16 that was the last meeting for four of us get</p> <p>17 together --</p> <p>18 Q. That was January -- give the exact</p> <p>19 date?</p> <p>20 A. January 26th.</p> <p>21 Q. January 26, 2018?</p> <p>22 A. No. No, January 26th.</p> <p>23 Q. What year?</p> <p>24 A. 2018.</p> <p>25 Q. Okay. Continue.</p>	<p style="text-align: right;">Page 144</p> <p>1 Yvette Wang</p> <p>2 provided by Strategic Vision to Eastern</p> <p>3 Profit under the contract?</p> <p>4 A. Yes, I did.</p> <p>5 Q. Which ones?</p> <p>6 A. The one on January 26th.</p> <p>7 Q. Any others?</p> <p>8 A. The second one and the last one, I</p> <p>9 don't know that's called report or not. The</p> <p>10 so-called 80 gigabyte data.</p> <p>11 Q. When was that provided?</p> <p>12 A. 1/30 or 1/31. I don't remember that</p> <p>13 clearly. You can check that date.</p> <p>14 Q. Did you review anything that was</p> <p>15 provided by Strategic Vision prior to January</p> <p>16 26th?</p> <p>17 A. Nothing.</p> <p>18 Q. What is your understanding as to</p> <p>19 whether anything had been provided under the</p> <p>20 agreement?</p> <p>21 A. Sorry, what is the question?</p> <p>22 Q. What is your understanding as to</p> <p>23 whether anything had been provided under the</p> <p>24 agreement?</p> <p>25 A. Oh, okay. My understanding, under</p>
<p style="text-align: right;">Page 143</p> <p>1 Yvette Wang</p> <p>2 A. And from that meeting first,</p> <p>3 Strategic Vision admitted they made mistake,</p> <p>4 they apologized, and they delivered nothing</p> <p>5 and with a delay date. After that, I</p> <p>6 believe --</p> <p>7 Q. Could I just ask, what do you mean</p> <p>8 by delay date?</p> <p>9 A. You remember in the contract, the</p> <p>10 first month they should deliver weekly</p> <p>11 report. That never ever happened.</p> <p>12 Q. And the delay date, is that a</p> <p>13 reference from January 6th to January 16th?</p> <p>14 A. Yes, yes. Not only that.</p> <p>15 Q. What else, go ahead?</p> <p>16 A. Because as long as January 6th the</p> <p>17 contract signed, and they should start to</p> <p>18 deliver the weekly report. That never</p> <p>19 happened. And then by January 26th, finally,</p> <p>20 there was a, which I, by the way, I do not</p> <p>21 have the copy. They just briefly, very</p> <p>22 quickly, show us, apologized, and then they</p> <p>23 took them away.</p> <p>24 Q. Have you personally reviewed any of</p> <p>25 the reports or flash drives that were</p>	<p style="text-align: right;">Page 145</p> <p>1 Yvette Wang</p> <p>2 the agreement, they should provide weekly</p> <p>3 report in first month, which they didn't.</p> <p>4 Q. Did they provide anything, though?</p> <p>5 A. Nothing.</p> <p>6 Q. Nothing, as far as you know, nothing</p> <p>7 was given to any representative of Eastern</p> <p>8 Profit prior to the January 26th meeting?</p> <p>9 A. You are 100 percent right.</p> <p>10 Q. And what was presented at the</p> <p>11 January 26th meeting, as far as form or</p> <p>12 substance?</p> <p>13 A. Mike and Ms. Wallop brought a, they</p> <p>14 called virgin laptop. It's a Lenovo, I</p> <p>15 remember. And they said, their report can</p> <p>16 only be presented on virgin laptop, never</p> <p>17 connect with any internet. So they brought</p> <p>18 that laptop together with a flash drive,</p> <p>19 which is encrypted. There's a keyboard on</p> <p>20 the flash drive. So they presented the</p> <p>21 report with those devices.</p> <p>22 Do you want to know the content of</p> <p>23 the report?</p> <p>24 Q. Yes.</p> <p>25 A. Okay. So it's all based on my</p>

<p style="text-align: right;">Page 146</p> <p>1 Yvette Wang</p> <p>2 memory. So they didn't, by the way, they</p> <p>3 didn't leave any copy or any copy of that</p> <p>4 report to us. So I remember that was about</p> <p>5 like ten or a dozen -- 10 or 12 pages of a</p> <p>6 PDF, word -- a PDF file. But mainly about</p> <p>7 like the documents which we provided to them.</p> <p>8 Like, for example, the fish, like they just</p> <p>9 repeat, like open this file for this fish.</p> <p>10 But there is nothing in there. Something</p> <p>11 like that. It's really very blurry my</p> <p>12 memory.</p> <p>13 Because during that presentation, I</p> <p>14 remember Mike was sweating a lot, a lot. And</p> <p>15 he was very nervous. And Ms. Wallop and Mike</p> <p>16 both were repeatedly apologized, saying they</p> <p>17 have internal communication problem with</p> <p>18 their project manager. So by the way, that</p> <p>19 presentation was conducted by Mike.</p> <p>20 So I was sitting aside, I don't</p> <p>21 remember, or standing behind them, just very</p> <p>22 quickly went through the screen, laptop</p> <p>23 screen. So my memory is not that clear. But</p> <p>24 basically, there is nothing like valuable.</p> <p>25 Q. What did you tell Mike and Ms.</p>	<p style="text-align: right;">Page 148</p> <p>1 Yvette Wang</p> <p>2 something which is meaningful or valuable.</p> <p>3 Q. Did you say anything about the</p> <p>4 contract or payment or termination, anything</p> <p>5 along those lines?</p> <p>6 A. You mean on January 26th?</p> <p>7 Q. Yes.</p> <p>8 A. No, not yet.</p> <p>9 Q. And when you say -- you say project</p> <p>10 manager, did they ever identify who the</p> <p>11 project manager was?</p> <p>12 A. Who identified?</p> <p>13 Q. You've used the term a couple of</p> <p>14 times their project manager, their project</p> <p>15 manager and miscommunication?</p> <p>16 A. Yes.</p> <p>17 Q. Did Mr. Waller or Ms. Wallop ever</p> <p>18 say who their project manager was?</p> <p>19 A. You mean their project manager?</p> <p>20 Q. Yes.</p> <p>21 A. No, they didn't. But it sounds like</p> <p>22 that project manager resides somewhere not in</p> <p>23 the U.S., Europe somewhere.</p> <p>24 Q. What about, were there any</p> <p>25 communications between Eastern Profit and</p>
<p style="text-align: right;">Page 147</p> <p>1 Yvette Wang</p> <p>2 Wallop at that meeting on January 26th?</p> <p>3 A. You mean me?</p> <p>4 Q. You or Mr. Guo. Was anybody else</p> <p>5 there?</p> <p>6 A. No, just the four of us. We told</p> <p>7 them clearly, we are very extremely</p> <p>8 disappointed. And we told them first the</p> <p>9 seriously delay, the timeline which agreed</p> <p>10 and signed in the contract, and we gave them</p> <p>11 enough time, and they didn't even start it.</p> <p>12 And we are very disappointed, and we cannot</p> <p>13 accept that at all.</p> <p>14 Q. Anything else?</p> <p>15 A. And then they keep apologizing and</p> <p>16 they said they have their team working, which</p> <p>17 they didn't say who, of course, and where.</p> <p>18 And they said they will go to meet their</p> <p>19 project manager in person to pick up their</p> <p>20 raw material, which is about like 60</p> <p>21 gigabyte.</p> <p>22 And then we were extremely</p> <p>23 disappointed, and we said, whatever you have,</p> <p>24 just bring that to me. See whether there is</p> <p>25 something, again, like garbage today or</p>	<p style="text-align: right;">Page 149</p> <p>1 Yvette Wang</p> <p>2 Strategic Vision between the January 26th</p> <p>3 meeting and the January 31st delivery?</p> <p>4 MR. GRENDI: Objection. You</p> <p>5 can answer.</p> <p>6 A. Between Eastern and Strategic</p> <p>7 Vision, you mean?</p> <p>8 Q. Yes.</p> <p>9 A. No, I don't believe so.</p> <p>10 Q. So you never communicated with --</p> <p>11 you or Mr. Guo to your knowledge, never</p> <p>12 communicated in between those two meetings?</p> <p>13 A. Between January 26th to when?</p> <p>14 January 31st?</p> <p>15 Q. January 31st.</p> <p>16 A. Why January 31st?</p> <p>17 Q. I think that's when you identified</p> <p>18 the next delivery was made. Am I right about</p> <p>19 that? If I'm wrong --</p> <p>20 A. Should be February 6th, after they</p> <p>21 offer this ten day. It should be like</p> <p>22 February somehow. But we did communicate, I</p> <p>23 believe.</p> <p>24 Q. What was the nature of those</p> <p>25 communications?</p>



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<p style="text-align: right;">Page 150</p> <p>1 Yvette Wang</p> <p>2 A. Who you mean, right?</p> <p>3 Q. What was the nature of the</p> <p>4 communications?</p> <p>5 A. The nature of the communication was</p> <p>6 we basically asked them stop going around,</p> <p>7 let's talk about the project. And your fault</p> <p>8 or your mistake is your problem. And we have</p> <p>9 been patient enough and given you enough</p> <p>10 time. And we are very disappointed and we</p> <p>11 are asking whether they are real capable of</p> <p>12 doing this project or not.</p> <p>13 Q. So this was in --</p> <p>14 MR. GRENDI: Objection.</p> <p>15 Actually, not objection, I just want</p> <p>16 to point out we're over 1 o'clock. I</p> <p>17 don't know where this line of</p> <p>18 questioning, if you want to wrap it</p> <p>19 up or if you want to break now.</p> <p>20 MR. SCHMIT: It's up to you. I</p> <p>21 probably have ten more minutes on</p> <p>22 this topic, but we can break now.</p> <p>23 THE WITNESS: I'm with you.</p> <p>24 Ten more minutes.</p> <p>25 BY MR. SCHMIT:</p>	<p style="text-align: right;">Page 152</p> <p>1 Yvette Wang</p> <p>2 Mike was going to fly to their project</p> <p>3 manager to meet him face to face and to pick</p> <p>4 up the flash drive and fly back right away to</p> <p>5 deliver to us. And then we give them one</p> <p>6 more chance. And --</p> <p>7 Q. When did you give them that one more</p> <p>8 chance?</p> <p>9 A. When you mean?</p> <p>10 Q. Yes, when.</p> <p>11 A. 26th.</p> <p>12 Q. Okay. Continue.</p> <p>13 A. And then I remember Mike started to</p> <p>14 text me directly. Because before that, I</p> <p>15 only directly Signal text to Ms. Wallop. So</p> <p>16 Mike text me, told me where should I go and</p> <p>17 when. He said, Union Station, Track Bar.</p> <p>18 And it's late afternoon, like five or</p> <p>19 something p.m. And then I went there. And</p> <p>20 that was the date and place he gave me that</p> <p>21 second flash drive with that like 80 or 60</p> <p>22 gigabyte things.</p> <p>23 Q. Did you personally review that flash</p> <p>24 drive?</p> <p>25 A. You mean in the Union Station?</p>
<p style="text-align: right;">Page 151</p> <p>1 Yvette Wang</p> <p>2 Q. After January 26th, what was the</p> <p>3 next deliverable or meeting you had with</p> <p>4 either Ms. Wallop or Mr. Waller?</p> <p>5 MR. GRENDI: Objection. You</p> <p>6 can answer.</p> <p>7 A. You mean deliverable meeting dates</p> <p>8 requested based on the contract or which is</p> <p>9 real --</p> <p>10 Q. The next time you saw him. The next</p> <p>11 time you met with him or spoke with them to</p> <p>12 get something from them?</p> <p>13 A. That is the so-called 60 or 80</p> <p>14 gigabyte. I don't remember that.</p> <p>15 Q. How was that delivered?</p> <p>16 A. That happened in Penn Station.</p> <p>17 Track Bar, there's a bar in there.</p> <p>18 Q. About when was that? Was that the</p> <p>19 January 31st or the February 6th date?</p> <p>20 A. I don't remember that. But you can</p> <p>21 check from my Signal message. It should be</p> <p>22 very end, 30th or 31st of January. I don't</p> <p>23 remember, but you can check that from my</p> <p>24 records. So that is after the January 26th</p> <p>25 meeting. And then Mike and Ms. Wallop said,</p>	<p style="text-align: right;">Page 153</p> <p>1 Yvette Wang</p> <p>2 Q. No, at all, ever.</p> <p>3 A. I did.</p> <p>4 Q. You did?</p> <p>5 A. Uh-huh.</p> <p>6 Q. Where did you do that?</p> <p>7 A. I went back to meet Mr. Guo because</p> <p>8 he was quite waiting for that. So I came</p> <p>9 back from the station.</p> <p>10 Q. On the same day?</p> <p>11 A. The same day, right away. Right</p> <p>12 away.</p> <p>13 Q. And you're sure which day was this,</p> <p>14 you say?</p> <p>15 A. I don't remember that date. Please</p> <p>16 check, they are there. And we were together,</p> <p>17 went through that flash drive.</p> <p>18 Q. Had you been given any instructions</p> <p>19 about what to look for on that flash drive?</p> <p>20 A. No.</p> <p>21 Q. So Mr. Waller and Ms. Wallop didn't</p> <p>22 ask you at all, you know, this is what you</p> <p>23 should look for, this is what's in there?</p> <p>24 A. No, they didn't say anything.</p> <p>25 Q. Was there anything going on at the</p>



<p style="text-align: right;">Page 154</p> <p>1 Yvette Wang</p> <p>2 time that Eastern Profit needed that</p> <p>3 information at that time?</p> <p>4 A. I'm sorry, I don't understand your</p> <p>5 question.</p> <p>6 Q. Did Eastern Profit miss anything or</p> <p>7 breach a contract or not be able to do</p> <p>8 anything because it didn't have the</p> <p>9 information on the 26th or whatever the</p> <p>10 subsequent date is?</p> <p>11 MR. GRENDI: Objection. You</p> <p>12 can answer.</p> <p>13 A. I don't remember clearly. But I did</p> <p>14 remember like Mr. Guo, he was waiting for</p> <p>15 that information for his plan.</p> <p>16 Q. Why was he waiting for that</p> <p>17 information?</p> <p>18 A. Why?</p> <p>19 Q. Yes.</p> <p>20 A. Because he needs that information.</p> <p>21 Q. To do what?</p> <p>22 A. To do his tech now, Chinese</p> <p>23 Communist party work.</p> <p>24 MS. TESKE: Objection.</p> <p>25 A. He has been doing for last two,</p>	<p style="text-align: right;">Page 156</p> <p>1 Yvette Wang</p> <p>2 research continue, did you have somebody else</p> <p>3 continue to research individuals?</p> <p>4 A. I have no idea. I don't know.</p> <p>5 Q. You've not been involved in any</p> <p>6 research or investigation projects since</p> <p>7 Foley Hoag sent this letter?</p> <p>8 A. Correct.</p> <p>9 Q. Do you know who Rich Higgins is?</p> <p>10 A. Rich?</p> <p>11 Q. Rich Higgins?</p> <p>12 A. Sorry, who is this person?</p> <p>13 Q. That's the question. Do you know</p> <p>14 who that person is, Rich Higgins?</p> <p>15 A. Rich Higgins, sounds -- the name is</p> <p>16 familiar. Is it the guy with DOJ? Is that</p> <p>17 the guy? No, I don't know.</p> <p>18 Q. Who were you thinking of just now?</p> <p>19 A. Because there was a newspaper talk,</p> <p>20 there is a DOJ employee was sued before,</p> <p>21 maybe I was wrong. Something similar like</p> <p>22 that one.</p> <p>23 MR. GRENDI: Can you give me a</p> <p>24 spelling on Higgins?</p> <p>25 MR. SCHMIT: H-I-G-G-E-N-S. It</p>
<p style="text-align: right;">Page 155</p> <p>1 Yvette Wang</p> <p>2 three years.</p> <p>3 Q. How is he going to use that</p> <p>4 information in order to do that?</p> <p>5 MS. TESKE: Object.</p> <p>6 MR. GRENDI: Objection.</p> <p>7 A. I don't know.</p> <p>8 Q. You never asked?</p> <p>9 A. No.</p> <p>10 MR. SCHMIT: Why don't we break</p> <p>11 for lunch now?</p> <p>12 (Whereupon, a luncheon recess</p> <p>13 was taken.)</p> <p>14 BY MR. SCHMIT:</p> <p>15 Q. Welcome back, Ms. Wang.</p> <p>16 A. Thank you.</p> <p>17 Q. Just remember you're still under</p> <p>18 oath.</p> <p>19 A. Yes.</p> <p>20 Q. After the termination letter that we</p> <p>21 looked at a short while ago was sent, what,</p> <p>22 if anything, did Eastern Profit do to carry</p> <p>23 on the prong as we've referred to it as?</p> <p>24 A. Ask Foley Hoag to follow up.</p> <p>25 Q. That's not what I'm asking. Did the</p>	<p style="text-align: right;">Page 157</p> <p>1 Yvette Wang</p> <p>2 might be I-N-S, I'm not sure.</p> <p>3 Q. You don't recognize that name? As</p> <p>4 far as you know, Eastern Profit doesn't work</p> <p>5 with him?</p> <p>6 A. No.</p> <p>7 Q. Has Eastern Profit done anything to</p> <p>8 retain some other firm or individual to do</p> <p>9 the research it wanted strategic alliance to</p> <p>10 do -- or Strategic Vision, excuse me?</p> <p>11 A. I don't know.</p> <p>12 Q. Not to your knowledge?</p> <p>13 A. Not with my knowledge.</p> <p>14 Q. Do you know who William Yu, Y-U, is?</p> <p>15 A. No, I don't know.</p> <p>16 Q. You never met anybody by that name?</p> <p>17 A. William Yu, no, never.</p> <p>18 Q. To your knowledge, is Mr. Guo</p> <p>19 carrying on the work we've been discussing in</p> <p>20 any way, shape or form since Strategic Vision</p> <p>21 was terminated?</p> <p>22 MR. GRENDI: Objection. You</p> <p>23 can answer.</p> <p>24 A. I don't know.</p> <p>25 Q. You have not been involved?</p>

<p style="text-align: right;">Page 158</p> <p>1 Yvette Wang</p> <p>2 A. No.</p> <p>3 MS. TESKE: Same objection.</p> <p>4 MR. SCHMIT: Let's mark this as</p> <p>5 Exhibit 7.</p> <p>6 (Whereupon, at this time, the</p> <p>7 reporter marked the above-mentioned</p> <p>8 bank document as Wang Exhibit 7 for</p> <p>9 identification.)</p> <p>10 BY MR. SCHMIT:</p> <p>11 Q. I'm handing you what's been marked</p> <p>12 for your deposition as Exhibit 7. Do you</p> <p>13 have that in front of you?</p> <p>14 A. Yes.</p> <p>15 Q. It's got the production numbers in</p> <p>16 the lower right-hand corner of Eastern, a</p> <p>17 bunch of zeros, 21 through 22.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recognize this document?</p> <p>21 A. Yes.</p> <p>22 Q. What is it?</p> <p>23 A. It's bank document.</p> <p>24 Q. Do you know what it is conveying or</p> <p>25 signifying?</p>	<p style="text-align: right;">Page 160</p> <p>1 Yvette Wang</p> <p>2 (Whereupon, at this time, the</p> <p>3 reporter marked the above-mentioned</p> <p>4 corporate telegraphic transfer</p> <p>5 cancellation amendment request as</p> <p>6 Wang Exhibit 8 for identification.)</p> <p>7 BY MR. SCHMIT:</p> <p>8 Q. I'm going to hand you what's been</p> <p>9 marked for your deposition, ma'am, as Exhibit</p> <p>10 8.</p> <p>11 A. Thank you.</p> <p>12 Q. Eastern 279 to 280.</p> <p>13 A. Yes.</p> <p>14 Q. Have you ever seen this before?</p> <p>15 A. Yes.</p> <p>16 Q. What is it?</p> <p>17 A. It's a corporate telegraphic</p> <p>18 transfer cancellation amendment request.</p> <p>19 Q. Who is making the request?</p> <p>20 A. Looks like ACA Capital Group</p> <p>21 Limited.</p> <p>22 Q. And, again, do you know why they're</p> <p>23 making this request?</p> <p>24 A. I guess from the date, it looks like</p> <p>25 they tried to cancel the wire.</p>
<p style="text-align: right;">Page 159</p> <p>1 Yvette Wang</p> <p>2 A. This shows a transaction with</p> <p>3 beneficiary name, Strategic Vision.</p> <p>4 Q. Have you ever seen this document</p> <p>5 before?</p> <p>6 (Witness peruses document.)</p> <p>7 A. Yes, I did.</p> <p>8 Q. What is it?</p> <p>9 A. Huh?</p> <p>10 Q. What is it?</p> <p>11 A. It's a bank proof document.</p> <p>12 Q. Proving what?</p> <p>13 A. Proving looks like a wire transfer</p> <p>14 to Strategic Vision. Happened on January 2,</p> <p>15 2018.</p> <p>16 Q. Who is sending the wire?</p> <p>17 A. ACA Capital Group Limited.</p> <p>18 Q. And do you know why ACA Capital</p> <p>19 Group Limited is sending a wire to Strategic</p> <p>20 Vision?</p> <p>21 A. From this project, that this should</p> <p>22 be the deposit. Because the time match,</p> <p>23 looks like.</p> <p>24 MR. SCHMIT: Can we just have</p> <p>25 this marked as 8, please.</p>	<p style="text-align: right;">Page 161</p> <p>1 Yvette Wang</p> <p>2 Q. To your knowledge, did anybody from</p> <p>3 Eastern Profit or anyone for that matter,</p> <p>4 tell Strategic Vision, Hey, we're going to</p> <p>5 try to cancel the wire we sent?</p> <p>6 A. I have no knowledge about that.</p> <p>7 Q. You didn't do it?</p> <p>8 A. No, I didn't.</p> <p>9 Q. And again, you weren't involved in</p> <p>10 any conversations regarding why the wire was</p> <p>11 canceled?</p> <p>12 A. I'm sorry, what is the question?</p> <p>13 Q. You weren't involved in any</p> <p>14 conversations concerning why the wire was</p> <p>15 canceled; is that a correct statement?</p> <p>16 A. I was not involved in any</p> <p>17 conversation of that.</p> <p>18 Q. And looking at this doesn't refresh</p> <p>19 your recollection of anything?</p> <p>20 A. No, no.</p> <p>21 MR. SCHMIT: Mark this as 9,</p> <p>22 please.</p> <p>23 (Whereupon, at this time, the</p> <p>24 reporter marked the above-mentioned</p> <p>25 e-mail chain as Wang Exhibit 9 for</p>

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<p style="text-align: right;">Page 178</p> <p>1 Yvette Wang</p> <p>2 Guo. I told him, this is still not my</p> <p>3 contract, but I can see there's recap here,</p> <p>4 right, this is new, and then what do you want</p> <p>5 me to do. And then he said, Then just sign</p> <p>6 it. Then I sign it.</p> <p>7 Q. Just yes or no to this. Was</p> <p>8 Mr. Smith involved at this stage of the</p> <p>9 proceedings, Gare Smith who you identified</p> <p>10 earlier?</p> <p>11 A. I know Gare Smith; you mean</p> <p>12 preceding these proceeding?</p> <p>13 Q. No. During these negotiations</p> <p>14 you're talking?</p> <p>15 A. With Ms. Wallop, right?</p> <p>16 Q. Was Gare Smith?</p> <p>17 A. Yes.</p> <p>18 Q. Was he involved in any of these</p> <p>19 meetings or looking at the drafts or helping</p> <p>20 you out in any fashion?</p> <p>21 A. No.</p> <p>22 Q. When was the last time you would</p> <p>23 have spoken or conferred with him?</p> <p>24 A. I don't remember that clearly.</p> <p>25 Sometime late December. I don't remember</p>	<p style="text-align: right;">Page 180</p> <p>1 Yvette Wang</p> <p>2 research Eastern required during a short</p> <p>3 timeframe.</p> <p>4 Do you see that?</p> <p>5 A. Yes.</p> <p>6 Q. When did they -- is that a</p> <p>7 representation that was made to you?</p> <p>8 A. Made to me?</p> <p>9 Q. Yes.</p> <p>10 A. I don't understand the question.</p> <p>11 Made to me with what?</p> <p>12 Q. Did somebody say that to you?</p> <p>13 A. Yes.</p> <p>14 Q. Who said that?</p> <p>15 A. Strategic Vision.</p> <p>16 Q. Who is Strategic Vision?</p> <p>17 A. Ms. French Wallop and Mr. J. Michael</p> <p>18 Waller.</p> <p>19 Q. Who said those words, though; who</p> <p>20 made those representations to you?</p> <p>21 A. Both of them.</p> <p>22 Q. On separate occasions, at the same</p> <p>23 time?</p> <p>24 A. At the same time. At the same time.</p> <p>25 Q. When was that made?</p>
<p style="text-align: right;">Page 179</p> <p>1 Yvette Wang</p> <p>2 that clearly.</p> <p>3 Q. But at some point he looked at a</p> <p>4 draft and you discussed it with him? Don't</p> <p>5 tell me what you discussed.</p> <p>6 A. Yes.</p> <p>7 Q. If you could just look at the</p> <p>8 fraudulent misrepresentation count there.</p> <p>9 Page 6.</p> <p>10 (Witness peruses document.)</p> <p>11 A. Yes.</p> <p>12 Q. It says there, if you look at</p> <p>13 paragraph 32, Prior to entering into the</p> <p>14 contract representatives for Strategic Vision</p> <p>15 made the following representations to</p> <p>16 Eastern.</p> <p>17 Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. Who were the representatives of</p> <p>20 Strategic Vision referring to?</p> <p>21 A. Ms. French Wallop and Mr. J. Michael</p> <p>22 Waller.</p> <p>23 Q. Now, you know, it says, A, Strategic</p> <p>24 Vision had a highly skilled in-house team of</p> <p>25 investigators ready to conduct the detailed</p>	<p style="text-align: right;">Page 181</p> <p>1 Yvette Wang</p> <p>2 A. Well, a couple of times.</p> <p>3 Q. When was the first time that</p> <p>4 representation was made?</p> <p>5 A. I remember the first time should</p> <p>6 be -- first time which I was there is like</p> <p>7 mid December, something like that, almost</p> <p>8 every, each meeting about this project, and</p> <p>9 the Strategic Vision that two person, and</p> <p>10 they always repeatedly, repeatedly tell or</p> <p>11 told Mr. Guo and me, they are this, very</p> <p>12 capable, very experienced.</p> <p>13 Q. The best?</p> <p>14 A. Yes. The best in the industry.</p> <p>15 Q. Specifically, with respect to, A,</p> <p>16 highly skilled in-house team of</p> <p>17 investigators.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. What words did they use to convey</p> <p>21 that?</p> <p>22 A. What words? They said they have</p> <p>23 project manager, they have different team in</p> <p>24 different kind of, like, country, and they</p> <p>25 have quite a lot of significant clients who</p>

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<p style="text-align: right;">Page 182</p> <p>1 Yvette Wang</p> <p>2 they served and they named them as a</p> <p>3 reference. But they refused to tell us,</p> <p>4 like, what position in their team, like those</p> <p>5 kind of details.</p> <p>6 Q. So they identified clients for you?</p> <p>7 A. Yes.</p> <p>8 Q. Who were the clients they</p> <p>9 identified?</p> <p>10 A. Some Russian official, Middle</p> <p>11 Eastern royal family people. I believe you</p> <p>12 have the names. Handwriting by Ms. Wallop,</p> <p>13 yeah.</p> <p>14 Q. Did you attempt to contact them or</p> <p>15 verify those stories at all?</p> <p>16 A. No, I didn't, personally, I didn't.</p> <p>17 Q. Did Mr. Guo?</p> <p>18 A. I don't know.</p> <p>19 Q. Did anybody else, as far as you</p> <p>20 know?</p> <p>21 A. No idea.</p> <p>22 Q. Did you and Mr. Guo or anybody else</p> <p>23 ever talk about these clients and the work</p> <p>24 Strategic Vision had done for them or</p> <p>25 anything along those lines?</p>	<p style="text-align: right;">Page 184</p> <p>1 Yvette Wang</p> <p>2 When you use the term in-house, is that a</p> <p>3 word that came out of Ms. Wallop's or Mr.</p> <p>4 Waller's mouth?</p> <p>5 A. I believe this is described their</p> <p>6 project manager.</p> <p>7 Q. It says here, they said highly</p> <p>8 skilled in-house team. I'm just wondering,</p> <p>9 did they ever actually use the term in-house?</p> <p>10 Did you ever discuss with them what they</p> <p>11 meant by in-house?</p> <p>12 A. The in-house means their people.</p> <p>13 They always called them our people.</p> <p>14 Q. So they said -- that's what I'm</p> <p>15 trying to get. I want to know what they</p> <p>16 said. Did they say our people?</p> <p>17 A. Yes. So in my understanding, okay,</p> <p>18 your people, it's your team. And it should</p> <p>19 be in-house, not you --</p> <p>20 Q. Well, did they ever say in-house,</p> <p>21 though? That's the question.</p> <p>22 A. They said my people, our people.</p> <p>23 Q. Our people, my people?</p> <p>24 A. Yes.</p> <p>25 Q. Something along those lines but</p>
<p style="text-align: right;">Page 183</p> <p>1 Yvette Wang</p> <p>2 A. Personally, I didn't.</p> <p>3 Q. Did you ever ask Mr. Waller or Ms.</p> <p>4 Wallop, you know, more about their team or</p> <p>5 how they would do it or what they wanted to</p> <p>6 do?</p> <p>7 A. We mentioned, we asked, yes.</p> <p>8 Q. What did they say?</p> <p>9 A. They refused to tell too much</p> <p>10 details. They just say they are very</p> <p>11 capable. And they use for the clients, and</p> <p>12 they are experienced, but I don't know who</p> <p>13 they are or where are they.</p> <p>14 Q. But they told you they weren't going</p> <p>15 to tell you, right? I mean, you asked and</p> <p>16 they said, We're not going to reveal that</p> <p>17 information?</p> <p>18 MR. GRENDI: Objection. You</p> <p>19 can answer.</p> <p>20 A. We did not ask the name. And they</p> <p>21 didn't disclosure too much details.</p> <p>22 Q. Did you ask them for more detail?</p> <p>23 A. I don't remember that. I don't</p> <p>24 remember that part.</p> <p>25 Q. Did they specifically say in-house?</p>	<p style="text-align: right;">Page 185</p> <p>1 Yvette Wang</p> <p>2 never used the words in-house?</p> <p>3 A. I don't remember that.</p> <p>4 Q. How about, B, why don't you read</p> <p>5 that to yourself.</p> <p>6 (Witness peruses document.)</p> <p>7 A. Yes.</p> <p>8 Q. Did a representation about former</p> <p>9 intelligence officers, was that ever</p> <p>10 discussed in your presence?</p> <p>11 A. You mean, is there any formal</p> <p>12 intelligence officer shows in front of me?</p> <p>13 Q. No, no. You had discussions, I</p> <p>14 assume, it says Strategic Vision here in the</p> <p>15 complaint. This is the complaint filed by</p> <p>16 Eastern Profit.</p> <p>17 A. Oh, okay.</p> <p>18 Q. Did somebody from Strategic Vision</p> <p>19 ever specifically say they had a former</p> <p>20 intelligence officer or anything like that?</p> <p>21 A. Yes, they did.</p> <p>22 Q. And when would those representations</p> <p>23 have been made?</p> <p>24 A. Many times. Almost every -- each of</p> <p>25 the meetings about this project.</p>

<p style="text-align: right;">Page 186</p> <p>1 Yvette Wang</p> <p>2 Q. Did you ask them what they meant by</p> <p>3 that?</p> <p>4 A. What is your question?</p> <p>5 Q. Did you ask them what they meant by</p> <p>6 a former intelligence officer?</p> <p>7 A. What does that mean?</p> <p>8 Q. Did you ask them what they meant</p> <p>9 when they said former intelligence officer?</p> <p>10 A. We ask, like who they are, what did</p> <p>11 they work for, like for previous -- like</p> <p>12 their employer or their experience. And</p> <p>13 basically we didn't ask too much, but we did</p> <p>14 ask. Mainly they, I mean, Ms. Wallop and</p> <p>15 Mike, they voluntarily kept talking with us.</p> <p>16 Keep introducing us many, many times. And</p> <p>17 even I can feel clearly by the end of some</p> <p>18 meeting, we start to lose our patience, like,</p> <p>19 let's stop education, let's talk about the</p> <p>20 contract and project.</p> <p>21 Q. So at a certain point you got sick</p> <p>22 of hearing about their capabilities and what</p> <p>23 they can do?</p> <p>24 A. What is the question?</p> <p>25 MR. GRENDI: Objection.</p>	<p style="text-align: right;">Page 188</p> <p>1 Yvette Wang</p> <p>2 something.</p> <p>3 Q. Breaking something?</p> <p>4 A. They described that. Yes.</p> <p>5 Q. When you look at sophisticated</p> <p>6 financial tracking, what would your</p> <p>7 expectation be?</p> <p>8 A. Legal.</p> <p>9 Q. Legal versus nonlegal?</p> <p>10 A. Yes. Because what they said to us</p> <p>11 is not legal. It's common sense, we don't</p> <p>12 need that.</p> <p>13 Q. What did they say to you?</p> <p>14 A. They said climb the wall and see the</p> <p>15 assets. So in our understanding, it's not</p> <p>16 legal.</p> <p>17 Q. So at that point you didn't really</p> <p>18 rely on that, in fact, you told them, We</p> <p>19 don't want that; is that a stair statement?</p> <p>20 MR. GRENDI: Objection.</p> <p>21 Objection.</p> <p>22 You can answer.</p> <p>23 A. What is your question?</p> <p>24 Q. At that point, when you heard that</p> <p>25 from Ms. Wallop or Mr. Waller, you said, No,</p>
<p style="text-align: right;">Page 187</p> <p>1 Yvette Wang</p> <p>2 Q. At a certain point you got tired of</p> <p>3 hearing about their capabilities and what</p> <p>4 they can do?</p> <p>5 A. Yes. Because they are repeating so</p> <p>6 many, many times.</p> <p>7 Q. And you just said, Let's get to the</p> <p>8 contract and let's negotiate it?</p> <p>9 A. No. We said, Let's just see what we</p> <p>10 can do together, not specifically which</p> <p>11 contract or which investigation.</p> <p>12 Q. At the end of the day, was it really</p> <p>13 important to you whether there was a former</p> <p>14 intelligence officer involved or not?</p> <p>15 A. That is their team. And we have no</p> <p>16 control about that team.</p> <p>17 Q. What did you -- the capabilities of</p> <p>18 conducting sophisticated financial tracking,</p> <p>19 do you remember many conversations about</p> <p>20 that?</p> <p>21 A. Yes.</p> <p>22 Q. What was said about that?</p> <p>23 A. Like they said they are capable of</p> <p>24 climb the wall and watch the thing right</p> <p>25 there. Like, sounds like they are breaking</p>	<p style="text-align: right;">Page 189</p> <p>1 Yvette Wang</p> <p>2 we don't want that?</p> <p>3 A. Correct, correct.</p> <p>4 Q. You don't have to do that, right?</p> <p>5 A. Correct.</p> <p>6 MR. GRENDI: Objection. I'm</p> <p>7 just going to advise you to please</p> <p>8 not raise your voice at the witness.</p> <p>9 I think -- I know you're trying to</p> <p>10 get information.</p> <p>11 MR. SCHMIT: I'm not raising my</p> <p>12 voice at all. I think the record</p> <p>13 will reflect --</p> <p>14 MR. GRENDI: Well, I think --</p> <p>15 MR. SCHMIT: It's been going a</p> <p>16 little clearer now that we're getting</p> <p>17 a better understanding, but I don't</p> <p>18 think I've been raising my voice at</p> <p>19 all.</p> <p>20 THE WITNESS: By the way, I</p> <p>21 don't like people have their cell</p> <p>22 phone in front of me like this. It</p> <p>23 just makes me uncomfortable. So that</p> <p>24 will slow down my answer to you. I'm</p> <p>25 just trying to help here.</p>

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194 to 197

<p style="text-align: right;">Page 194</p> <p>1 Yvette Wang</p> <p>2 it afterwards?</p> <p>3 A. He said, No, no, no, no.</p> <p>4 Q. Wasn't it Mr. Guo that asked whether</p> <p>5 you could access money from banks of these</p> <p>6 people you were identifying?</p> <p>7 MS. TESKE: Object.</p> <p>8 A. What is your question?</p> <p>9 Q. Didn't Mr. Guo ask representatives</p> <p>10 from Strategic Vision whether they could</p> <p>11 access money from the bank accounts of the</p> <p>12 people that were being identified by Eastern</p> <p>13 Profit?</p> <p>14 MS. TESKE: Object.</p> <p>15 MR. GRENDI: Same objection.</p> <p>16 A. I don't remember that.</p> <p>17 Q. You don't remember that happening at</p> <p>18 all?</p> <p>19 A. No.</p> <p>20 Q. Let's go on to page 7. C there,</p> <p>21 they had represented other sophisticated</p> <p>22 clients in the past, including Republican</p> <p>23 politicians, a Middle Eastern prince, and a</p> <p>24 leader of the Russian Opposition Party. Do</p> <p>25 you see that?</p>	<p style="text-align: right;">Page 196</p> <p>1 Yvette Wang</p> <p>2 A. Because otherwise why Ms. Wallop</p> <p>3 handwrite all the client's name? I mean,</p> <p>4 some of the very important client's name in</p> <p>5 Miles Guo's handbook -- notebook.</p> <p>6 Q. You have no reason to believe that</p> <p>7 it wasn't true, right?</p> <p>8 MR. GRENDI: Objection. You</p> <p>9 can answer.</p> <p>10 A. Personally, I believe it's true.</p> <p>11 Q. And do you believe some of those</p> <p>12 clients might have included Republican</p> <p>13 politicians?</p> <p>14 A. I don't know about that.</p> <p>15 Q. Do you have any reason to believe</p> <p>16 they didn't?</p> <p>17 A. I have no knowledge about that.</p> <p>18 Q. Do you know whether Ms. Wallop is a</p> <p>19 Republican or a Democrat?</p> <p>20 A. It's not my business. I never know</p> <p>21 about that.</p> <p>22 Q. How about Middle Eastern princes?</p> <p>23 A. Yes.</p> <p>24 Q. Any reason to think the clients in</p> <p>25 the past didn't include a Middle Eastern</p>
<p style="text-align: right;">Page 195</p> <p>1 Yvette Wang</p> <p>2 A. Yes.</p> <p>3 Q. And that -- when was that</p> <p>4 representation made?</p> <p>5 A. I forget the time. In one of the</p> <p>6 meetings about this project.</p> <p>7 Q. And did you follow up with any of</p> <p>8 these individuals to even verify that they</p> <p>9 were clients?</p> <p>10 A. Follow up? You mean?</p> <p>11 Q. Call them, e-mail them, text them?</p> <p>12 A. I didn't.</p> <p>13 Q. Did anybody at your direction?</p> <p>14 A. From me, I didn't.</p> <p>15 Q. Do you know of it being done at all?</p> <p>16 A. I have no idea.</p> <p>17 Q. Do you have any reason to believe</p> <p>18 that this is not a true statement, that they</p> <p>19 represented sophisticated clients in the</p> <p>20 past? What about that --</p> <p>21 A. Personally, I believe that is true.</p> <p>22 Q. You do believe that is a true</p> <p>23 statement?</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 197</p> <p>1 Yvette Wang</p> <p>2 prince?</p> <p>3 A. It should be on the handwriting,</p> <p>4 some of them.</p> <p>5 Q. You believed it to be true?</p> <p>6 A. I believe the handwriting, it's</p> <p>7 true.</p> <p>8 Q. And do you have any reason to</p> <p>9 believe that what was written on that sheet</p> <p>10 of paper, napkin whatever you're describing</p> <p>11 wasn't true?</p> <p>12 A. Which paper?</p> <p>13 Q. Wherever the prince's name was</p> <p>14 written down. My question is, do you have</p> <p>15 any reason to believe that that prince was</p> <p>16 not a former client of Strategic Vision or</p> <p>17 Ms. Wallop or Mr. Waller?</p> <p>18 A. After I saw Ms. Wallop, her</p> <p>19 handwriting on Mr. Guo's notebook, I believe</p> <p>20 they are true.</p> <p>21 Q. And a leader of the Russian</p> <p>22 Opposition Party, do you have any reason to</p> <p>23 believe that Strategic Vision didn't</p> <p>24 represent a leader of the Russian Opposition</p> <p>25 Party?</p>

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198 to 201

<p style="text-align: right;">Page 198</p> <p>1 Yvette Wang</p> <p>2 A. Same answer.</p> <p>3 Q. You believed them to be true?</p> <p>4 A. Yes.</p> <p>5 Q. Have you discovered anything since</p> <p>6 then to in any way make you question that?</p> <p>7 A. Same answer like before, no.</p> <p>8 Q. Paragraph 34, it says here,</p> <p>9 Strategic Vision also told Eastern that</p> <p>10 Eastern's one million dollar deposit would be</p> <p>11 used as a deposit against the last payments</p> <p>12 owed by Eastern at the end of the contract.</p> <p>13 Paragraph, upon information and belief</p> <p>14 Strategic Vision also knew this statement to</p> <p>15 be false.</p> <p>16 Why was that statement false?</p> <p>17 A. I don't understand this statement.</p> <p>18 Can you please help me?</p> <p>19 Q. It's Eastern Profit's complaint.</p> <p>20 That's the one million dollar deposit under</p> <p>21 the agreement.</p> <p>22 A. That's right, this is drafted by</p> <p>23 lawyer. English is not my first language,</p> <p>24 sorry about that. I'm trying to understand.</p> <p>25 Q. Was that representation ever made to</p>	<p style="text-align: right;">Page 200</p> <p>1 Yvette Wang</p> <p>2 they, Strategic Vision is going to issue</p> <p>3 invoice every month and the client is just to</p> <p>4 pay the invoice.</p> <p>5 Q. So it would stand out there, and the</p> <p>6 client, you would still owe the monthly fees?</p> <p>7 MR. GRENDI: Objection. You</p> <p>8 could answer.</p> <p>9 Q. That's what evergreen means, right?</p> <p>10 A. Correct, yes.</p> <p>11 Q. In other words, to give you an</p> <p>12 example, you paid a million dollars and you</p> <p>13 get that bill for \$750,000. If the million</p> <p>14 dollars is an evergreen deposit, or in our</p> <p>15 business a retainer, you still have to pay</p> <p>16 that \$750,000, right?</p> <p>17 A. That is evergreen, you are right.</p> <p>18 Pay month by month and this deposit stay</p> <p>19 there.</p> <p>20 Q. What happens to that evergreen</p> <p>21 deposit at the end of the contract?</p> <p>22 A. They didn't say clearly in the</p> <p>23 contract, which means Strategic Vision should</p> <p>24 return that deposit after this project is</p> <p>25 terminated.</p>
<p style="text-align: right;">Page 199</p> <p>1 Yvette Wang</p> <p>2 you?</p> <p>3 (Witness peruses document.)</p> <p>4 A. From the contract side --</p> <p>5 Q. So you're referring back to the</p> <p>6 contract that's been marked. What exhibit is</p> <p>7 that for the record?</p> <p>8 A. Your Exhibit number 2.</p> <p>9 Q. Okay.</p> <p>10 A. Page number 5. The client will pay</p> <p>11 the contractor a deposit of U.S. dollar one</p> <p>12 million upon signing the contract. The</p> <p>13 deposit will be credited on a prorated basis</p> <p>14 to the final one to one-third month of the</p> <p>15 contract.</p> <p>16 In my understanding, this one</p> <p>17 million should not be used against the last</p> <p>18 payment.</p> <p>19 Q. Should not be used?</p> <p>20 A. Correct.</p> <p>21 Q. What should have happened with the</p> <p>22 one million dollar deposit upon --</p> <p>23 A. This is, in my understanding, an</p> <p>24 evergreen deposit, which means that one</p> <p>25 million just stay there as one million. And</p>	<p style="text-align: right;">Page 201</p> <p>1 Yvette Wang</p> <p>2 Q. Well, it says here, the deposit will</p> <p>3 be credited on a prorated basis to the final</p> <p>4 one and one-third months of the contract. Do</p> <p>5 you see that?</p> <p>6 A. Yes.</p> <p>7 Q. What is your understanding of that?</p> <p>8 A. Can I say, I don't understand what</p> <p>9 is prorated basis? I don't understand this.</p> <p>10 Q. You don't know what prorated -- you</p> <p>11 don't have a view as to what prorated basis</p> <p>12 means?</p> <p>13 A. I'm not quite familiar with that.</p> <p>14 Q. What language of this contract would</p> <p>15 say that Strategic Vision should just return</p> <p>16 the million dollars at the end of the</p> <p>17 contract?</p> <p>18 A. They didn't clearly say that</p> <p>19 sentence in the contract.</p> <p>20 Q. It's not in there, right?</p> <p>21 A. Correct.</p> <p>22 Q. When was the final day of the</p> <p>23 contract?</p> <p>24 MR. GRENDI: Objection. You</p> <p>25 can answer.</p>



<p style="text-align: right;">Page 202</p> <p>1 Yvette Wang</p> <p>2 A. Final day?</p> <p>3 Q. You sent a letter on February 23rd,</p> <p>4 but if you look at the last sentence, I'll</p> <p>5 just point it out to you, it discusses 30</p> <p>6 days written notice.</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. So what's the final day of the</p> <p>10 contract?</p> <p>11 MR. GRENDI: Just objection. I</p> <p>12 think the letter speaks for itself,</p> <p>13 but she can answer.</p> <p>14 A. This is really a mathematic</p> <p>15 question.</p> <p>16 Q. Okay.</p> <p>17 A. I mean, anyone can calculate.</p> <p>18 Q. Calculate from when, what numbers?</p> <p>19 A. From the letter.</p> <p>20 Q. Okay.</p> <p>21 A. From the letter of Foley Hoag. And</p> <p>22 we, based on the contract, gave them 30 days</p> <p>23 notice time.</p> <p>24 Q. Beginning on February 23rd?</p> <p>25 MR. GRENDI: Same objection.</p>	<p style="text-align: right;">Page 204</p> <p>1 Yvette Wang</p> <p>2 the complaint. And you were comparing it to</p> <p>3 the language in the contract marked as</p> <p>4 Exhibit 2.</p> <p>5 Now, I think in the end you had just</p> <p>6 said that other than the million dollar</p> <p>7 deposit, Eastern Profit had made no other</p> <p>8 payments to Strategic Vision; is that</p> <p>9 correct?</p> <p>10 A. Correct.</p> <p>11 Q. So under those circumstances, let's</p> <p>12 just assume for a second you guys had no</p> <p>13 complaints, but had given a termination</p> <p>14 notice. How would that million dollar</p> <p>15 deposit be used?</p> <p>16 MR. GRENDI: Objection.</p> <p>17 Q. In other words, the contract went</p> <p>18 fine, and you just decided to terminate it</p> <p>19 for reasons unrelated, and we've got that</p> <p>20 million dollar deposit. What are we supposed</p> <p>21 to do with it?</p> <p>22 MR. GRENDI: Objection. You</p> <p>23 can answer.</p> <p>24 A. You mean, what is our expectation to</p> <p>25 Strategic Vision about that one million,</p>
<p style="text-align: right;">Page 203</p> <p>1 Yvette Wang</p> <p>2 A. Why February 23rd?</p> <p>3 Q. Isn't that the date of the letter?</p> <p>4 A. That's right.</p> <p>5 Q. What does the contract say?</p> <p>6 A. One month notice time.</p> <p>7 Q. So it would be one month after</p> <p>8 February 23rd, correct?</p> <p>9 A. Yes.</p> <p>10 MR. GRENDI: Objection.</p> <p>11 Q. Did -- and I think you answered this</p> <p>12 this morning, I just want to make sure. Did</p> <p>13 Eastern Profit pay, other than the deposit,</p> <p>14 did they pay any money to Strategic Vision?</p> <p>15 A. No.</p> <p>16 MR. GRENDI: Let's just -- can</p> <p>17 we take a break for two minutes?</p> <p>18 MR. SCHMIT: Sure.</p> <p>19 (Whereupon, a brief recess was</p> <p>20 taken.)</p> <p>21 BY MR. SCHMIT:</p> <p>22 Q. We're back on the record.</p> <p>23 A. Yes.</p> <p>24 Q. We were talking how the million</p> <p>25 dollar deposit would be used, paragraph 34 of</p>	<p style="text-align: right;">Page 205</p> <p>1 Yvette Wang</p> <p>2 right?</p> <p>3 Q. Yes.</p> <p>4 A. They should return.</p> <p>5 Q. Even if the contract -- if the</p> <p>6 contract had been performed and you had made</p> <p>7 no other payments for the three-month period,</p> <p>8 they would just return the million dollars?</p> <p>9 A. Correct.</p> <p>10 Q. What is that based on? What</p> <p>11 language of the contract is that based on?</p> <p>12 A. Because that one million was wired</p> <p>13 and hit Strategic Vision's account without a</p> <p>14 contract signed. This is a financial or</p> <p>15 understanding mistake. Even with the</p> <p>16 contract signed, that million should be</p> <p>17 returned back and after the contract signed</p> <p>18 and wired again. That is a professional</p> <p>19 proper financial procedure.</p> <p>20 Q. Did anybody ever ask, until this</p> <p>21 lawsuit or, excuse me, until the Foley Hoag</p> <p>22 letter for the million dollars to be</p> <p>23 returned?</p> <p>24 A. Yes, we did.</p> <p>25 Q. You asked them? When did you ask?</p>

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210 to 213

<p style="text-align: right;">Page 210</p> <p>1 Yvette Wang</p> <p>2 Strategic Vision is owed 750,000 times three,</p> <p>3 we've agreed, right?</p> <p>4 A. Go ahead.</p> <p>5 Q. We've agreed, so far --</p> <p>6 A. This is said in the contract, the</p> <p>7 words in the contract.</p> <p>8 Q. Yes, exactly. They're owed that</p> <p>9 money, but the only money that's been given</p> <p>10 to them by Eastern Profit is the million</p> <p>11 dollar deposit. Under that scenario, what</p> <p>12 should we do with the million dollar deposit?</p> <p>13 A. Should be refunded.</p> <p>14 Q. Why?</p> <p>15 A. Because there is no performance in</p> <p>16 here at all.</p> <p>17 Q. No, we're assuming performance was</p> <p>18 okay. It's a hypothetical. Are you familiar</p> <p>19 with that term?</p> <p>20 A. No.</p> <p>21 Q. Okay. We're just setting up -- I'm</p> <p>22 eliminating, for the sake of argument, the</p> <p>23 whole point of this question is you agree</p> <p>24 with performance. You think Strategic Vision</p> <p>25 did a great job, I know you didn't, okay. I</p>	<p style="text-align: right;">Page 212</p> <p>1 Yvette Wang</p> <p>2 MR. SCHMIT: Off the record for</p> <p>3 a second.</p> <p>4 MR. GRENDI: Sure.</p> <p>5 (Discussion held off the</p> <p>6 record.)</p> <p>7 Q. I'm going to hand you, Ms. Wang, an</p> <p>8 exhibit -- excuse me, we're not going to mark</p> <p>9 it as an exhibit but it has production</p> <p>10 numbers SVUS 000171 through 000259.</p> <p>11 MR. GRENDI: Wait, can we go</p> <p>12 off the record again? I'm sorry.</p> <p>13 MR. SCHMIT: Okay.</p> <p>14 (Discussion held off the</p> <p>15 record.)</p> <p>16 MR. SCHMIT: Okay, let's mark</p> <p>17 it as an exhibit.</p> <p>18 (Whereupon, at this time, the</p> <p>19 reporter marked the above-mentioned</p> <p>20 name list as Wang Exhibit 12 for</p> <p>21 identification.)</p> <p>22 BY MR. SCHMIT:</p> <p>23 Q. I'm going to hand you what has been</p> <p>24 marked as Exhibit 12 for your deposition.</p> <p>25 A. Thank you.</p>
<p style="text-align: right;">Page 211</p> <p>1 Yvette Wang</p> <p>2 know you don't. But let's assume that they</p> <p>3 did a great job, they worked for three</p> <p>4 months. All they were paid was a million</p> <p>5 dollar deposit. In other words, even though</p> <p>6 they did great work, you didn't pay them for</p> <p>7 the three months, you didn't pay the 750,000</p> <p>8 or the 750,000 for February, the 750,000 for</p> <p>9 the part of March. Okay? Are you with me so</p> <p>10 far?</p> <p>11 A. Kind of.</p> <p>12 Q. Okay. What should happen at that</p> <p>13 point with the million dollar deposit?</p> <p>14 A. Back to your Exhibit number 2.</p> <p>15 Q. Okay.</p> <p>16 A. Yes, right here, your Exhibit number</p> <p>17 2, page number 5. The deposit will be</p> <p>18 credited on a prorated basis to the final one</p> <p>19 to one-third month of the contract. They can</p> <p>20 use the deposit.</p> <p>21 Q. To pay what's owed?</p> <p>22 A. This is said in the contract. If I</p> <p>23 may --</p> <p>24 MR. GRENDI: Hold on, wait for</p> <p>25 questions.</p>	<p style="text-align: right;">Page 213</p> <p>1 Yvette Wang</p> <p>2 Q. Just flip through it and let me know</p> <p>3 when you're finished. It has production</p> <p>4 numbers SVUS 000171 through 000259. And</p> <p>5 that's marked confidential and should remain</p> <p>6 confidential.</p> <p>7 Have you ever seen this document</p> <p>8 before?</p> <p>9 A. Yes.</p> <p>10 Q. What is it?</p> <p>11 A. They are the name list.</p> <p>12 Q. Where did it come from?</p> <p>13 A. Mr. Guo.</p> <p>14 Q. Where did Mr. Guo get it?</p> <p>15 A. I don't know.</p> <p>16 Q. Did you ever talk to him about it?</p> <p>17 A. No.</p> <p>18 MS. TESKE: I object to this</p> <p>19 whole line of questioning. Because I</p> <p>20 haven't seen the document, and I also</p> <p>21 don't think I can read the document.</p> <p>22 MR. GRENDI: Well, if you</p> <p>23 want --</p> <p>24 MS. TESKE: To the extent it</p> <p>25 concerns my client and I haven't had</p>

<p style="text-align: right;">Page 214</p> <p>1 Yvette Wang</p> <p>2 a chance to review it, I object to</p> <p>3 this line of questioning. This is</p> <p>4 not my client so I'm not going to</p> <p>5 direct her not to answer, but I would</p> <p>6 like to put my objection on the</p> <p>7 record.</p> <p>8 BY MR. SCHMIT:</p> <p>9 Q. Whose handwriting -- if you can look</p> <p>10 at page 5, 175 production number, page 5 in</p> <p>11 handwriting, whose handwriting is that?</p> <p>12 A. I don't know.</p> <p>13 Q. Same question for 177, page 7.</p> <p>14 A. I don't know.</p> <p>15 Q. Did Mr. Guo ever tell you where he</p> <p>16 got this list or this packet?</p> <p>17 MR. GRENDI: Objection. You</p> <p>18 can answer.</p> <p>19 A. No.</p> <p>20 Q. Did you ever ask?</p> <p>21 A. No.</p> <p>22 Q. When did you see it before?</p> <p>23 A. I don't remember that clearly. It</p> <p>24 should be December 2017.</p> <p>25 Q. At some point during the month of</p>	<p style="text-align: right;">Page 216</p> <p>1 Yvette Wang</p> <p>2 Q. Did you ever hear Mr. Guo tell</p> <p>3 anybody that he had paid \$250 million for the</p> <p>4 information in this document?</p> <p>5 A. I didn't hear that from myself, by</p> <p>6 myself.</p> <p>7 Q. Did you ever hear anybody else say</p> <p>8 that or --</p> <p>9 A. I don't remember.</p> <p>10 Q. It doesn't sound familiar at all?</p> <p>11 A. No.</p> <p>12 Q. You never heard him represent that</p> <p>13 to Ms. Wallop or Mr. Waller?</p> <p>14 A. I don't remember that.</p> <p>15 Q. Remember as in it didn't happen or</p> <p>16 you're not sure one way or another?</p> <p>17 A. I just don't remember whether that</p> <p>18 happened or not. No memory about that.</p> <p>19 Q. Did you ever discuss how he gathered</p> <p>20 the names or the information?</p> <p>21 A. No.</p> <p>22 MR. SCHMIT: Mark this as 13.</p> <p>23 (Whereupon, at this time, the</p> <p>24 reporter marked the above-mentioned</p> <p>25 background report as Wang Exhibit 13</p>
<p style="text-align: right;">Page 215</p> <p>1 Yvette Wang</p> <p>2 December of 2017?</p> <p>3 A. Correct.</p> <p>4 Q. Who was -- was it just you and</p> <p>5 Mr. Guo?</p> <p>6 A. Correct.</p> <p>7 Q. Ms. Wallop and Mr. Waller weren't at</p> <p>8 that meeting?</p> <p>9 A. No.</p> <p>10 Q. What did he tell you? Did he tell</p> <p>11 you to do anything with this document?</p> <p>12 A. He said this is about this project.</p> <p>13 Q. And did he instruct you to do</p> <p>14 anything with it?</p> <p>15 A. Go to talk, discuss about the</p> <p>16 contract, if signed please deliver this to</p> <p>17 Strategic Vision.</p> <p>18 Q. And you ended up delivering this to</p> <p>19 Strategic Vision?</p> <p>20 A. Correct.</p> <p>21 Q. Did you ever hear Mr. Guo say that</p> <p>22 he had paid \$250 million for this document,</p> <p>23 and the information within it?</p> <p>24 A. Can you repeat?</p> <p>25 MS. TESKE: Object.</p>	<p style="text-align: right;">Page 217</p> <p>1 Yvette Wang</p> <p>2 for identification.)</p> <p>3 BY MR. SCHMIT:</p> <p>4 Q. I will hand you what was marked as</p> <p>5 Exhibit 13.</p> <p>6 (Witness peruses document.)</p> <p>7 Q. It is a background report with the</p> <p>8 production number Eastern 144 through 195.</p> <p>9 A. Yes.</p> <p>10 Q. Can you just let me know when you're</p> <p>11 finished reviewing?</p> <p>12 A. Yes, you can go ahead.</p> <p>13 Q. Have you ever seen this before?</p> <p>14 A. Yes.</p> <p>15 Q. What is it?</p> <p>16 A. This is the one file in the 80</p> <p>17 gigabyte.</p> <p>18 Q. So about -- we're not sure what day</p> <p>19 you received the 80 gigabyte, though, right?</p> <p>20 A. You remember Penn Station, Track</p> <p>21 Bar? That's the date I received the 80</p> <p>22 gigabyte.</p> <p>23 Q. Is this a report Strategic Vision</p> <p>24 had within the 80 gigabytes?</p> <p>25 A. Correct.</p>

<p style="text-align: right;">Page 234</p> <p>1 Yvette Wang</p> <p>2 was dark. I told her I will have to take a</p> <p>3 train, go back to New York. Because I have</p> <p>4 my schedule on Monday. And that day was a</p> <p>5 Saturday.</p> <p>6 So she offered -- first she tried to</p> <p>7 persuade me to stay one more day, which is</p> <p>8 Sunday, to continue to discuss and finish</p> <p>9 this contract. And she offered to drive me</p> <p>10 to my hotel. That was the drive there. And</p> <p>11 because of the four hours that drive, so this</p> <p>12 was my second time in her car. I</p> <p>13 automatically came to the back seat instead</p> <p>14 of the front seat. So this text message</p> <p>15 referring this. Because I am a guest, I have</p> <p>16 to respect the owner's habit to always put me</p> <p>17 in the back.</p> <p>18 MR. SCHMIT: Mark this as 17,</p> <p>19 please.</p> <p>20 (Whereupon, at this time, the</p> <p>21 reporter marked the above-mentioned</p> <p>22 screen shot of text messages as Wang</p> <p>23 Exhibit 17 for identification.)</p> <p>24 BY MR. SCHMIT:</p> <p>25 Q. Here is Exhibit 17.</p>	<p style="text-align: right;">Page 236</p> <p>1 Yvette Wang</p> <p>2 was full of issues.</p> <p>3 A. The whole message here refers to the</p> <p>4 USB flash drive. This message was January</p> <p>5 8th. On January 6th, we sign a contract.</p> <p>6 Right after sign a contract, I gave her a USB</p> <p>7 drive with the information of your Exhibit</p> <p>8 number 12. And she took the USB, plugged it</p> <p>9 in her Mac, and click the USB and click this</p> <p>10 PDF file, and open that. And me and her, we</p> <p>11 went through every -- each of the page of</p> <p>12 this (indicating).</p> <p>13 During this process, I never touch</p> <p>14 any of her devices. And then we went through</p> <p>15 from bottom, top to bottom, bottom to top,</p> <p>16 like a couple of minutes. I explained to</p> <p>17 her, and she scrolled up, down, and she</p> <p>18 admitted she received your number Exhibit 12,</p> <p>19 PDF file with no problem at all.</p> <p>20 And then after that, I left, I went</p> <p>21 back to New York. And before this Exhibit</p> <p>22 number 17 message, on page 220, and Ms.</p> <p>23 Wallop called me. She said she could not</p> <p>24 open the flash drive again. I have no idea</p> <p>25 what happened with her device, with her</p>
<p style="text-align: right;">Page 235</p> <p>1 Yvette Wang</p> <p>2 A. Thank you.</p> <p>3 Q. I've handed you what has been marked</p> <p>4 as Exhibit 17. It is Eastern 220 through</p> <p>5 222.</p> <p>6 Do you have that in front of you?</p> <p>7 A. Yes.</p> <p>8 Q. Just let me know when you're</p> <p>9 finished.</p> <p>10 (Witness peruses document.)</p> <p>11 A. Okay, finished.</p> <p>12 Q. Do you recall this exchange?</p> <p>13 A. Yes.</p> <p>14 Q. Who is speaking in the first page?</p> <p>15 Is that you or Ms. French?</p> <p>16 A. French.</p> <p>17 Q. What is she referring to? This</p> <p>18 should be very concerning for your team as</p> <p>19 the item is full of issues.</p> <p>20 A. You mean the whole, this message</p> <p>21 refer?</p> <p>22 Q. Well, the part I just read to you.</p> <p>23 I mean, you can read as much as you want.</p> <p>24 But towards the bottom it says, This should</p> <p>25 be very concerning to your team as the item</p>	<p style="text-align: right;">Page 237</p> <p>1 Yvette Wang</p> <p>2 conduction of her computer.</p> <p>3 So she requested to have more copy</p> <p>4 of your Exhibit number 12 file. So I told</p> <p>5 her, I am so busy here. I have no time to</p> <p>6 take a train or flight to you. So she</p> <p>7 offered to come to me to New York City. So</p> <p>8 this is the message happened on your Exhibit</p> <p>9 17, about this.</p> <p>10 Q. So when you went first met, I guess,</p> <p>11 on January 6th, you were able to open the</p> <p>12 flash drive. And on whose computer was that?</p> <p>13 A. Ms. Wallop's computer, yes, we were</p> <p>14 able to open, go through a couple of times.</p> <p>15 And there's no issue, no problem at all.</p> <p>16 Q. And did you ever collect the flash</p> <p>17 drive back?</p> <p>18 A. The one --</p> <p>19 Q. Yes. After Ms. Wallop said, Hey,</p> <p>20 I'm having trouble with this, something is</p> <p>21 wrong. What did she say is wrong with it?</p> <p>22 A. What is your question?</p> <p>23 Q. What did she say was wrong with the</p> <p>24 flash drive?</p> <p>25 A. She said she couldn't open. And she</p>

<p style="text-align: right;">Page 258</p> <p>1 Yvette Wang</p> <p>2 those lines?</p> <p>3 MS. TESKE: Objection.</p> <p>4 A. I don't remember. I don't remember.</p> <p>5 Q. Back to Exhibit 20.</p> <p>6 A. Yes. I am there.</p> <p>7 Q. It says, As you know, big budget is</p> <p>8 ready for this long-term project. Investors</p> <p>9 can even pay your team without contract.</p> <p>10 What does that mean?</p> <p>11 A. The first sentence, big budget is</p> <p>12 ready for this long-term project, which I was</p> <p>13 told by Mr. Guo. In my understanding, the</p> <p>14 dissidents of Chinese government who are the</p> <p>15 real fighters for Chinese democracy and rule</p> <p>16 of law, they are a group of people in my</p> <p>17 understanding, so that is referring to that.</p> <p>18 The investor can even pay your team without</p> <p>19 contract, this refers to the one million,</p> <p>20 which we just discussed about that.</p> <p>21 Q. Who were the investors?</p> <p>22 A. The people, this is my definition,</p> <p>23 the people who are the real fighter for rule</p> <p>24 of law and democracy of China.</p> <p>25 Q. Are they shareholders of Eastern</p>	<p style="text-align: right;">Page 260</p> <p>1 Yvette Wang</p> <p>2 excuse me, a brokerage account with anybody?</p> <p>3 A. No idea at all.</p> <p>4 Q. Does Eastern Profit have clients or</p> <p>5 customers?</p> <p>6 A. I have no knowledge about this.</p> <p>7 Q. How does Eastern Profit make money,</p> <p>8 if it does?</p> <p>9 MR. GRENDI: Objection. You</p> <p>10 can answer.</p> <p>11 A. I heard this is an investment</p> <p>12 company, that's it.</p> <p>13 Q. Who did you hear that from?</p> <p>14 A. Mr. Guo.</p> <p>15 Q. What did he say regarding</p> <p>16 investments?</p> <p>17 A. This is an investment company.</p> <p>18 Q. Eastern Profit?</p> <p>19 A. Yes.</p> <p>20 Q. Well, who conducts the investments</p> <p>21 and how do they conduct their business?</p> <p>22 Where are they investing? Tell me about it.</p> <p>23 A. He didn't say.</p> <p>24 Q. He just said that it's an investing</p> <p>25 company?</p>
<p style="text-align: right;">Page 259</p> <p>1 Yvette Wang</p> <p>2 Profit?</p> <p>3 A. I don't know.</p> <p>4 Q. Do they invest into ACA Capital</p> <p>5 Limited?</p> <p>6 A. I don't know.</p> <p>7 Q. Does investor have anything</p> <p>8 whatsoever to do with actually putting money</p> <p>9 towards the project?</p> <p>10 A. I have no knowledge about this.</p> <p>11 Q. How is Eastern going to put this</p> <p>12 budget together?</p> <p>13 A. I have no idea.</p> <p>14 Q. I mean, you testified earlier, as</p> <p>15 far as you know, Eastern Profit didn't have</p> <p>16 bank accounts; is that right?</p> <p>17 MR. GRENDI: Objection.</p> <p>18 A. You mean have or did not have?</p> <p>19 Q. Does Eastern Profit have a bank</p> <p>20 account of any kind?</p> <p>21 A. I don't know.</p> <p>22 Q. Does Eastern Profit have investments</p> <p>23 of any kind?</p> <p>24 A. No idea.</p> <p>25 Q. Does Eastern Profit have a budget --</p>	<p style="text-align: right;">Page 261</p> <p>1 Yvette Wang</p> <p>2 A. Correct.</p> <p>3 Q. Did they have a portfolio they were</p> <p>4 managing?</p> <p>5 A. I have no idea. I didn't check. Iu</p> <p>6 have no idea.</p> <p>7 Q. And you didn't speak with Mr. Guo</p> <p>8 about today's deposition at all in order to</p> <p>9 prepare; is that right?</p> <p>10 A. I told him.</p> <p>11 Q. No, but did you speak to him and</p> <p>12 say, What can you tell me about Eastern</p> <p>13 Profit, I'm being deposed as their</p> <p>14 representative, anything along those lines?</p> <p>15 A. No, not in that detail. I didn't</p> <p>16 even see him.</p> <p>17 Q. What did you say to him on the</p> <p>18 phone -- did you speak with him on the phone?</p> <p>19 A. I mentioned to him a couple of days</p> <p>20 ago, I have this deposition.</p> <p>21 Q. What was his reaction?</p> <p>22 MS. TESKE: Object.</p> <p>23 A. He said okay.</p> <p>24 Q. Did you explain to him you were</p> <p>25 testifying as a representative of Eastern</p>

<p style="text-align: right;">Page 262</p> <p>1 Yvette Wang</p> <p>2 Profit?</p> <p>3 A. I didn't go that detail.</p> <p>4 Q. Did he seem to know anything about</p> <p>5 the deposition, that it was occurring or</p> <p>6 otherwise?</p> <p>7 MS. TESKE: Objection.</p> <p>8 MR. GRENDI: Objection.</p> <p>9 A. I didn't -- no.</p> <p>10 Q. Does Eastern Profit have any assets</p> <p>11 whatsoever as far as you know?</p> <p>12 A. No idea.</p> <p>13 Q. Does it have a relationship with a</p> <p>14 bank? Does it have any loans or anything</p> <p>15 like that?</p> <p>16 MR. GRENDI: Objection. You</p> <p>17 can answer.</p> <p>18 A. No idea about their loan with bank.</p> <p>19 MR. SCHMIT: Why don't we take</p> <p>20 five minutes?</p> <p>21 MR. GRENDI: I was just going</p> <p>22 to say that.</p> <p>23 (Whereupon, a brief recess was</p> <p>24 taken.)</p> <p>25 MR. SCHMIT: Mark this as</p>	<p style="text-align: right;">Page 264</p> <p>1 Yvette Wang</p> <p>2 A. I mentioned this message to him.</p> <p>3 Q. And what was his reaction?</p> <p>4 A. He said they are making excuse and</p> <p>5 it doesn't make any sense.</p> <p>6 Q. Why did he think it didn't make any</p> <p>7 sense?</p> <p>8 MS. TESKE: Object.</p> <p>9 A. I believe the two pages here, the</p> <p>10 main spirit or the main contact with never</p> <p>11 included in the contract, which is signed on</p> <p>12 January 6th.</p> <p>13 Q. I'm sorry, what's not included?</p> <p>14 A. The content of here.</p> <p>15 Q. Did Mr. Guo ever discuss that based</p> <p>16 on his experience this isn't how it worked or</p> <p>17 Mr. Waller had it all wrong?</p> <p>18 A. He didn't mention that to me.</p> <p>19 Q. In this context, was Mr. Guo getting</p> <p>20 more and more agitated?</p> <p>21 A. What do you mean agitated?</p> <p>22 Q. Angry, frustrated.</p> <p>23 MS. TESKE: Object.</p> <p>24 A. Oh, yes.</p> <p>25 Q. And in this time, did he ever say</p>
<p style="text-align: right;">Page 263</p> <p>1 Yvette Wang</p> <p>2 Exhibit 21.</p> <p>3 (Whereupon, at this time, the</p> <p>4 reporter marked the above-mentioned</p> <p>5 screen shot of text messages as Wang</p> <p>6 Exhibit 21 for identification.)</p> <p>7 BY MR. SCHMIT:</p> <p>8 Q. I'm going to hand you what's been</p> <p>9 marked as Exhibit 21.</p> <p>10 A. Thank you.</p> <p>11 Q. It is a two-page text message, 259</p> <p>12 through 260. Do you have that in front of</p> <p>13 you?</p> <p>14 A. Yes.</p> <p>15 Q. If you can just read the message and</p> <p>16 let me know when you're finished.</p> <p>17 (Witness peruses document.)</p> <p>18 A. Yes, I finished.</p> <p>19 Q. Did you receive this text message?</p> <p>20 A. Yes.</p> <p>21 Q. Did you ever discuss these issues</p> <p>22 with Mr. Waller?</p> <p>23 A. I believe no.</p> <p>24 Q. Did you ever discuss them with Mr.</p> <p>25 Guo?</p>	<p style="text-align: right;">Page 265</p> <p>1 Yvette Wang</p> <p>2 why he needed this information so</p> <p>3 immediately?</p> <p>4 MR. GRENDI: Objection.</p> <p>5 A. No, he didn't mention that. He said</p> <p>6 that before already.</p> <p>7 Q. He said what before?</p> <p>8 (Witness peruses document.)</p> <p>9 Q. Are you looking for a particular</p> <p>10 message?</p> <p>11 A. Yes. There was a timeline in my</p> <p>12 text message. On your Exhibit number 18,</p> <p>13 page 233, conveyed to him, this is my</p> <p>14 message, on January 16, to French Wallop, I</p> <p>15 said, Convey to him, he advised that if you</p> <p>16 could make it he needs to see the report</p> <p>17 before January 25th. And he has some plan</p> <p>18 from January 6th, which will need your input.</p> <p>19 Q. But did he ever tell -- as far as</p> <p>20 you know, did he ever tell you, let's start</p> <p>21 there, what the plan was? That was the</p> <p>22 question.</p> <p>23 MR. GRENDI: Objection. We've</p> <p>24 been over this a couple of times now,</p> <p>25 but go ahead.</p>

January 31, 2019

266 to 269

<p style="text-align: right;">Page 266</p> <p>1 Yvette Wang</p> <p>2 A. I believe I replied to you, sir, at</p> <p>3 least twice.</p> <p>4 Q. That's fine.</p> <p>5 A. And I don't know the plan details.</p> <p>6 Q. Do you have any sense of why there</p> <p>7 was this need for immediacy?</p> <p>8 A. Immediacy, you mean immediately?</p> <p>9 Q. Yes.</p> <p>10 A. I don't think it's immediately.</p> <p>11 Q. Was time of the essence or do you</p> <p>12 have any idea what was going to happen?</p> <p>13 MR. GRENDI: Objection. I</p> <p>14 just -- I'd recommend just using some</p> <p>15 phrases that are perhaps a little</p> <p>16 more straightforward. I want to make</p> <p>17 sure the witness clearly understands</p> <p>18 and can answer correctly, that's all.</p> <p>19 Go ahead.</p> <p>20 A. What is your question?</p> <p>21 Q. You're the 30(b)(6) witness for</p> <p>22 Eastern Profit?</p> <p>23 A. I am.</p> <p>24 Q. And you've educated yourself for</p> <p>25 today's deposition. Looking back, you have</p>	<p style="text-align: right;">Page 268</p> <p>1 Yvette Wang</p> <p>2 January 31st?</p> <p>3 A. What is your question?</p> <p>4 Q. Has Eastern Profit been damaged at</p> <p>5 all because it didn't have the information it</p> <p>6 wanted on January 26th or January 31st?</p> <p>7 A. Okay. I'm glad I asked you.</p> <p>8 Q. Go ahead.</p> <p>9 A. I believe I replied before, but I</p> <p>10 will reply again. The damage to Eastern</p> <p>11 Profit should be based on Eastern Profit</p> <p>12 calculation, which for now, I don't know.</p> <p>13 Q. So you can't, sitting here today,</p> <p>14 identify any damages that Eastern Profit has</p> <p>15 suffered?</p> <p>16 MR. GRENDI: Objection. It's</p> <p>17 not how the witness testified</p> <p>18 earlier, but go ahead.</p> <p>19 Q. Then tell me all you know about the</p> <p>20 damages that Eastern Profit has suffered.</p> <p>21 A. I will. So far, for now, and I can</p> <p>22 see that is a loan, need to pay back. Legal</p> <p>23 fee, logistics, all the related fees, right?</p> <p>24 But I believe this is not all their damage.</p> <p>25 Q. Is there -- is there a particular</p>
<p style="text-align: right;">Page 267</p> <p>1 Yvette Wang</p> <p>2 no idea what the plan was you've said or why</p> <p>3 this information was needed; is that a fair</p> <p>4 statement?</p> <p>5 MR. GRENDI: Objection. You</p> <p>6 can answer.</p> <p>7 A. I can tell you which I was told by</p> <p>8 Mr. Guo. His plan is his whistle blowing and</p> <p>9 disclosure corrupted Chinese official, and to</p> <p>10 bring the justice and bring the truth to the</p> <p>11 public. That is his plan, and --</p> <p>12 Q. Go ahead, were you done?</p> <p>13 A. I'm done.</p> <p>14 Q. Has he been unable to do that, has</p> <p>15 he missed a milestone or some sort of</p> <p>16 deadline that has in any way hurt his plans?</p> <p>17 MS. TESKE: Objection.</p> <p>18 MR. GRENDI: Objection.</p> <p>19 A. Yes. You are right. Sounds to me,</p> <p>20 he had his deadline, timeline to wait for</p> <p>21 this information.</p> <p>22 Q. And going back, though, has it in</p> <p>23 some way, has Eastern Profit, let's put it</p> <p>24 that way, been hurt, because it didn't have</p> <p>25 information expected on January 26th or</p>	<p style="text-align: right;">Page 269</p> <p>1 Yvette Wang</p> <p>2 clause in the contract that would entitle you</p> <p>3 to legal fees? Do you know anything about</p> <p>4 that?</p> <p>5 A. Which contract? Which clause?</p> <p>6 Q. Any one that would entitle Eastern</p> <p>7 Profit to damages, including legal fees?</p> <p>8 MS. TESKE: Objection.</p> <p>9 MR. GRENDI: Objection.</p> <p>10 A. I didn't see any contract except</p> <p>11 this one.</p> <p>12 Q. Okay. What clause in that contract,</p> <p>13 the contract we're discussing today, would</p> <p>14 entitle you to legal fees?</p> <p>15 MR. GRENDI: Objection.</p> <p>16 You can answer.</p> <p>17 A. There's no clause in this contract,</p> <p>18 I believe.</p> <p>19 Q. Okay. I mean, go ahead, if you can</p> <p>20 point it out. I would like to have you point</p> <p>21 it out.</p> <p>22 (Witness peruses document.)</p> <p>23 A. I believe in this contract, it</p> <p>24 didn't say anything about legal fees.</p> <p>25 Q. And with respect to the loan, just</p>



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1				1			
2	I N D E X			2	DOCUMENTS AND/OR		
3	EXAMINATION BY		PAGE	3	INFORMATION REQUESTED		PAGE LINE
4	Mr. Schmit		4	4			
5				5			
6	E X H I B I T S			6	Documents supporting loan	45	17
7				7			
8	WANG	DESCRIPTION	PAGE	8			
9	1	Notice of deposition	7	9			
10	2	Research agreement	11	10			
11	3	Responses and objections		11			
12	4	Research agreement	51	12			
13	5	Screen shot of text messages	103	13			
14	6	Three-page letter	135	14			
15	7	Bank document	158	15			
16	8	Corporate telegraphic transfer		16			
17		cancellation amendment		17			
18		request	160	18			
19	9	E-mail chain	161	19			
20	10	Handwritten document	164	20			
21	11	Complaint	167	21			
22	12	Name list	212	22			
23	13	Background report	216	23			
24	14	Background report	219	24			
25	15	Screen shot of text messages	224	25			
	16	Screen shot of text messages	230				
Page 279				Page 281			
1				1			
2				2	C E R T I F I C A T E		
3	(Exhibits cont.)			3	I, MICHELLE LEMBERGER, a shorthand		
4	WANG	DESCRIPTION	PAGE	4	reporter and Notary Public within and for		
5	17	Screen shot of text messages	234	5	the State of New York, do hereby certify:		
6	18	Screen shot of text messages	240	6	That the witness(es) whose testimony		
7	19	Screen shot of text messages	244	7	is hereinbefore set forth was duly sworn by		
8	20	Screen shot of text messages	254	8	me, and the foregoing transcript is a true		
9	21	Screen shot of text messages	263	9	record of the testimony given by such		
10	22	Screen shot of text messages	272	10	witness(es).		
11				11	I further certify that I am not		
12				12	related to any of the parties to this		
13				13	action by blood or marriage, and that I am		
14				14	in no way interested in the outcome		
15				15	of this matter.		
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## DEPOSITION ERRATA SHEET

Case Caption: Eastern Profit Corp v.  
Strategic Vision LLP

## DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury  
that I have read the entire transcript of my  
Deposition taken in the captioned matter or  
the same has been read to me, and the same is  
true and accurate, save and except for changes  
and/or corrections, if any, as indicated by me  
on the DEPOSITION ERRATA SHEET hereof, with  
the understanding that I offer these changes  
as if still under oath.

\_\_\_\_\_  
YVETTE WANG

Subscribed and sworn to on the \_\_\_\_ day of  
\_\_\_\_\_, 2019, before me,  
\_\_\_\_\_  
Notary Public,  
in and for the State of \_\_\_\_\_

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## DEPOSITION ERRATA SHEET

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YVETTE WANG